

**ALTERNATIVE  
PROVISION**

**Alternative Provision Service**

**Child Protection  
&  
Safeguarding  
Policy**

<b>Approved by:</b>	Management Committee	<b>Date:</b> 14 <sup>th</sup> October 2024
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## Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Headteacher	Michael Power	MichaelPower@sthelens.gov.uk
Designated Safeguarding Lead (DSL)	Katherine Crook	katherinecrook@sthelens.gov.uk
Deputy DSL	Andrew Ford Stuart Toole Rob Vaughan Tracey Harvey Clare Dawson	andrewford@sthelens.gov.uk stuarttoole@sthelens.gov.uk robertvaughan@sthelens.gov.uk traceyharvey@sthelens.gov.uk claredawson@sthelens.gov.uk
Local Authority Designated Officer (LADO)	Katherine Appleton	Sthelenslado@sthelens.gov.uk Tel: 01744 671265 (LADO Secretary)
Co-Chair of Management Committee	Jimmy McNamee & Tony Williams	
Management Committee Safeguarding Lead	Tony Williams	
Multi Agency Safeguarding Hub (MASH)	Monday – Thursday 09:00 – 17:00 Friday 09:00 – 16:30	01744676767
Emergency Duty Team (EDT)	Outside of the times above	EDT@halton.gov.uk 0345 0500 148
Merseyside Police		www.merseyside.police.uk 0151 709 6010
Prevent referrals		prevent@merseyside.pnn.police.uk adultandchildrenteam@sthelens.gov.uk
National Police Prevent Advice Line	The advice line is available to access from <b>9:00am-5:00pm</b> . If you are worried about someone  This enables you to share your concerns in confidence, with specially trained Prevent Officers.	0800 011 3764
	Any calls made outside of these hours will be transferred to specialist Counter Terrorism Officers.	

If you are deaf, hard of hearing or have a speech impediment	There is a police non-emergency number available via text on	<b>18001 101.</b>
If you are <b><i>in an emergency</i></b> , please ensure your safety		<b>Ring 999.</b>
Channel Coordinator SPOC	Claire Wright – Can you email Donna Cullen to make sure Claire Wright is still a contact	Claire.wright@liverpool.gov.uk
Donna Cullen	Safeguarding Children in Education Coordinator	01744 673379

## 1. Aims/Scope of Our Commitment

At St Helens Alternative Provision Service, we are committed to safeguarding and promoting the welfare of all children, in line with the duty placed on us by section 175 of the Education Act 2002.

We strongly believe that all children have the right to feel safe and to be protected from physical, sexual or emotional abuse and neglect.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. Throughout their time at The Alternative Provision Service students are taught how to safeguard themselves and families are provided with relevant information and support.

At all times, we consider what is in the best interests of the child.

We aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

## 2. Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2023), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

### **Trauma and Nurture**

"Understanding the SEMH needs of pupils is absolutely essential in developing a whole school approach to improving mental health and behaviour in schools" (from Mental health and behaviour in schools).

The 6 Principles of Nurture (NurtureUK) underpin our ethos. We have NurtureUK Status and use these approaches to understand and support students who are experiencing or have experienced trauma in their lives.

- ✓ Children's learning is understood developmentally.
- ✓ The classroom offers a safe base.
- ✓ The importance of nurture for the development of wellbeing.
- ✓ Language is a vital means of communication.
- ✓ All behaviour is communication.
- ✓ The importance of transition in children's lives.

## **3. Definitions**

**Safeguarding and Promoting the Welfare of Children** means:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

### **Safeguarding**

Safeguarding refers to the overall process of protecting children from abuse, neglect and exploitation. It encompasses ensuring that children's rights to be safe are upheld, and that they are protected from any risks that could harm their well-being.

### **Promoting the Welfare of Children**

This involves creating conditions that contribute to the healthy development of children, both physically and emotionally. It includes supporting their educational, social, and emotional needs, ensuring they grow up in environments that provide stability and security. Promoting welfare also means helping children achieve their potential and ensuring they are well-prepared for adulthood. This involves:

Ensuring children have opportunities for growth and learning.

Supporting their health and wellbeing

Providing a safe and caring environment that allows them to thrive.

Together, safeguarding and promoting the welfare of children involves both protection from harm and proactive support for their development.

**Child Protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Harm refers to any form of abuse neglect or exploitation that adversely affects a child's health development or wellbeing. This includes physical emotional sexual or psychological harm as well as the exposure to the risk of harm such as witnessing where they see hear or experience domestic Abuse or experience its effects or experiencing online abuse, technology can also be used to facilitate off-line abuse. It is important to remember that children can be abused in a family or in an institutional or community setting by those known to them or not although this is rarer. Appendix 1 explains the different types of abuse.

### **Exploitation**

Can include instances where a child or young person may be groomed to become involved in sexual or criminal activity.

**Neglect** is a form of abuse and 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. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video. Sharing refers to the sending, receiving, or sharing of all of the above.

### **Contextual Safeguarding**

This is recognising the different relationships that children form in their neighbourhoods, schools and online that can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

**Children** include everyone under the age of 18.

The following 3 **Safeguarding Partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged Perpetrator(s)** and **Perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis. We prefer to use the term 'child that has harmed.'

## 4. Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- . Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- . Are young carers.
- . May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- . Have English as an additional language.
- . Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- . Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- . Are asylum seekers?
- . Are at risk due to either their own or a family member's mental health needs.
- . Are a child in Care looked after by the Local Authority or previously a child in care (see section 12)
- . Are missing from education.
- . Whose parent/carer has expressed an intention to remove them from school to be home educated.

## 5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors at The Alternative Provision Service and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to off-site activities.

Our provision plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- . Relationships and Behaviour Policy
- . Pastoral support system
- . Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable?



## 5.1 All Staff

All staff employed by the Alternative Provision Service are expected to read at least Part 1 and Annex B of Keeping Children Safe in Education (KCSIE). The reading of this is recorded on our National College Platform

All staff will:

- Read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Complete annual training on National College and then complete a test of that knowledge on the same platform.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g., sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the Staff Behaviour (Code of Conduct), the role and identity of the designated safeguarding lead (DSL) and deputies, our Relationships and Behaviour Policy, our Online Safety Policy (including expectations relating to filtering and monitoring), our Attendance Policy (students) and including our safeguarding response to children who go missing from education.
- Our early help assessment process and their role in it, including identifying emerging problems, liaising with the SLT/DSL, and sharing information with other professionals to support early identification and assessment.
- Our process for making referrals to the relevant local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or gender questioning (LGBT) can be targeted by other children.
- What to look for to identify children who need help or protection

Section 15 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

## 5.2 Our Designated Safeguarding Lead (DSL)

Our DSL is **Katherine Crook** Safeguarding and Pastoral Manager, is a member of our Senior Leadership Team. As DSL she takes lead responsibility for child protection and wider safeguarding at The Alternative Provision Service, including Online Safety, Filtering and Monitoring.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSL is absent, our Deputy DSLs **Andrew Ford, Robert Vaughan, Stuart Toole, Tracey Harvey and Clare Dawson** will act as cover.

If the DSL/deputies are not available, Michael Power (Headteacher) will act as cover.

During the holiday periods a Rota for DSL availability/support is coordinated.

Our DSL is given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.

Our DSL will also:

- Keep the headteacher informed of any issues.
- Lead and support the Deputy DSLs and senior staff through meetings, supervisions etc.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Report to our Management Committee
- Attend relevant training/briefings and meetings.
- Support the upkeep of the SCR.

(The full responsibilities of the DSL and deputies are set out in their job description.)

### **5.3 Our Management Committee**

Our Management Committee will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Appoint a link Committee Member to monitor the effectiveness of this policy in conjunction with the full Management Committee. This link person also meets regularly with the DSL. (This is always a different person from the DSL)

- Ensure all staff attend relevant training/briefings and meetings linked to Safeguarding, Child Protection and Online Safety including Filtering and Monitoring
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
  - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- Our DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
- That our school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy
- That our policy reflects that child with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse, exploitation or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The chair of the Management Committee will act as the 'investigating officer' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All Management Committee Members will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how members are supported to fulfill their role.

#### 5.4 Our Headteacher

Our headteacher **Michael Power**, is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and via the school website.

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding, child protection and online training, and updating the content of the training regularly.
- Assigning an appropriate investigating officer in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
- Ensuring the SCR is maintained.
- Ensure Safer Recruitment procedures are followed.

## 5.5 Virtual School Heads

Virtual School Heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of pupils with a social worker. We liaise with the relevant Virtual School Head/Team as appropriate (depending on the area)

They should also identify and engage with key professionals, e.g., DSLs, SENCOs, social workers, mental health leads and others.

## 6. Confidentiality

At the Alternative Provision Service, we ensure: -

- Timely information sharing is essential to effective safeguarding.
- Operation Encompass and Police reports are shared with relevant staff and the information is used to support students and their families for e.g., by engaging in Early Help, referrals to agencies.
- We respond to and attend MARAC as requested, sharing information regarding the child as appropriate.
- 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 our children.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If our staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- Our staff would never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

Our DSL will ensure: -

- Parents or carers will normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of

criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

- Regarding anonymity, all our staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which our staff should know about the report, and any support for children involved.
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to our DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3.

## 7. Recognising Abuse and Taking Action

Staff, volunteers and Management Committee members must follow the procedures set out below in the event of a safeguarding issue.

### SAFEGUARDING AND CHILD PROTECTION AT ST HELENS ALTERNATIVE PROVISION SERVICE

It is every single member of staff's **responsibility** and **professional duty** to report and record any concern about a student's well-being and/or welfare immediately or any disclosure of a Child Protection (CP) nature.

#### You have a significant concern, or a student had made a disclosure to you

- Significant concerns/disclosures **MUST** immediately be verbally shared with the DSL/DDSL as appropriate.
  - You will then be directed to record the information on CPOMS.
- If the concern related to a child's injuries/unusual marks a body map must be completed

#### You have a concern about unusual or unexplained changes in a student's appearance, behaviour, attendance or basic needs.

The person raising the concern must record the concern electronically on the CPOMS system as soon as possible

The DSL/DDSL will check the CPOMS system daily for concerns and liaise with the relevant staff regarding appropriate actions and or next steps

Any follow up action must be recorded by the person undertaking the action onto the CPOMS system.

Please make sure you check to see if you have actions to complete

In the unlikely event of a technical problem with CPOMS the member of staff must ensure that the information is passed to the DDSL / Head of Provision who will record on CPOMS when it is available.

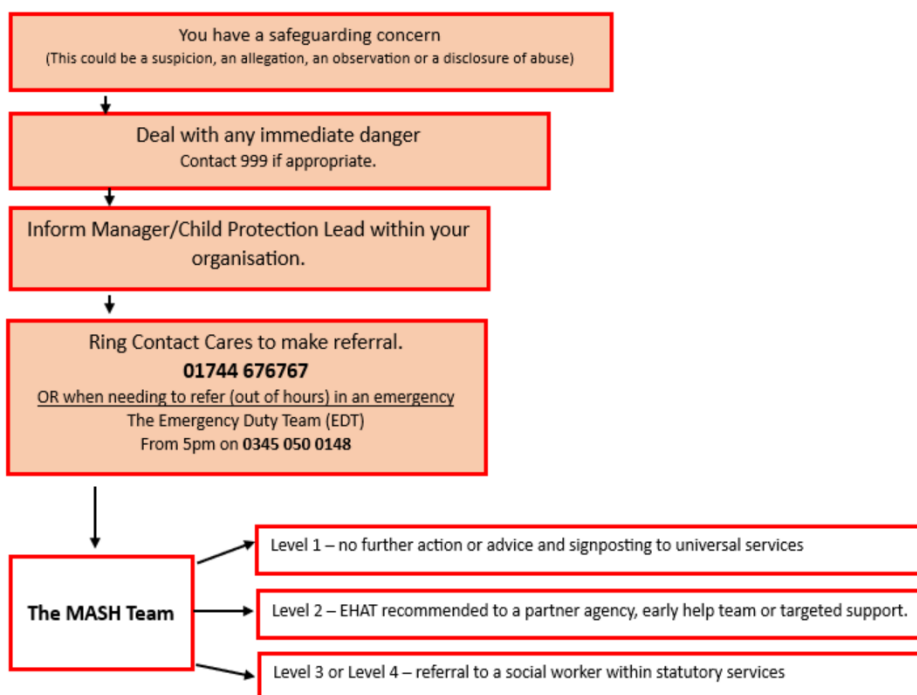
**If you have a concern outside of the working day  
Phone Children's Social Care 0345 050 0148 or the Police tel: 101/999 or NSPCC tel: 0808 005000**

## 7.1 If a Child is Suffering or Likely to Suffer Harm, or in Immediate Danger

### Members of our Leadership Team in Consultation with our DSL/DDSLs will: -

- Make a referral to children's social care and/or the police **immediately** if it is believed a child is suffering or likely to suffer from harm or is in immediate danger.

#### St Helens process for reporting concerns about children (Under 18)



- Keep our DSL updated as appropriate (see section 5.2) as soon as possible if you make a referral directly.
- Anyone can make a referral if required but this must then be shared immediately with DSL/DDSLs, however in the first instance every effort should be made to speak to a member of the senior leadership team first who will then support this process.

## 7.2 If a Child Makes a Disclosure to You

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgment on it - Alert a member of the SLT/DSL/DDSLs and then log this information on CPOMS.
- If CPOMS is not available write up on a note of concern form available at main reception on each site, sign and date the write-up and pass it on to DSL/DDSLs.

Bear in mind that some children may:

- Not feel ready or know how to tell someone that they are being abused, exploited, or neglected.

- Not recognise their experiences as harmful
- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child.

### 7.3 If you Discover that FGM has Taken Place or a Pupil is at risk of FGM.

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth.

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL/DDSLs who will support them to contact children’s social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL/DDSLs who will support them to contact the police and children’s social care.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

### 7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child’s welfare.

You have a concern about unusual or unexplained changes in a student’s appearance, behaviour, attendance or basic needs.			
The person raising the concern must record the concern electronically on the CPOMS system as soon as possible	The DSL/DDSL will check the CPOMS system daily for concerns and liaise with the relevant staff regarding appropriate actions and or next steps	Any follow up action must be recorded by the person undertaking the action onto the CPOMS system.  Please make sure you check to see if you have actions to complete	In the unlikely event of a technical problem with CPOMS the member of staff must ensure that the information is passed to the DDSL / Head of Provision who will record on CPOMS when it is available.

It is vital that you speak to the DSL/DDSLs to agree a course of action.

The DSL/DDSLs will review information shared and consider next steps which may include speaking to student, their parents, other agencies or making a referral to local authority children's social care for further support. All actions should be recorded on CPOMS, so a chronology is built.

### Early Help Assessment

Any child may benefit from early help. Early Help is 'support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.' All school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs.
- Has experienced multiple suspensions or is at the risk of permanent exclusion.
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need.
- is a young carer.
- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- is at risk of being radicalised or exploited.
- has a parent or carer in custody, previously was in prison or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- is misusing alcohol and other drugs themselves?
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

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If we feel the student/family would benefit from early help, a member of our SLT/DSL/DDSLs would discuss this with parents. Any conversations/offers of Early Help will be recorded on CPOMS. If an early help assessment is agreed to then the DDSL will discuss with the DSL an appropriate course of action to ensure relevant agencies are liaised with. They will also consider if additional advice is required from the contact centre. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

If appropriate, we will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

Our DSL/DDSLs will keep cases under constant review and will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

### Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL/DDSLs make the referral for support. All discussions and decisions will be recorded on CPOMS. Any referrals will also be uploaded to CPOMS.

Expectations when completing [St Helens Children and Young Peoples Service Request Form](#) can be found on page 38 of the [St Helens Description of Need Document](#)

The Local Authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the



referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

We will also continue to offer support to the student/their family as appropriate.

Any concerns regarding the referral will be raised with the Contact Centre or EDT outside working hours.

## 7.5 If you have Concerns about Extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL/DDSLs or member of the SLT first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of 'becoming involved with or supporting terrorism', or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- . Think someone is in immediate danger.
- . Think someone may be planning to travel to join an extremist group.
- . See or hear something that may be terrorist related.

## 7.6 If you have a Mental Health Concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

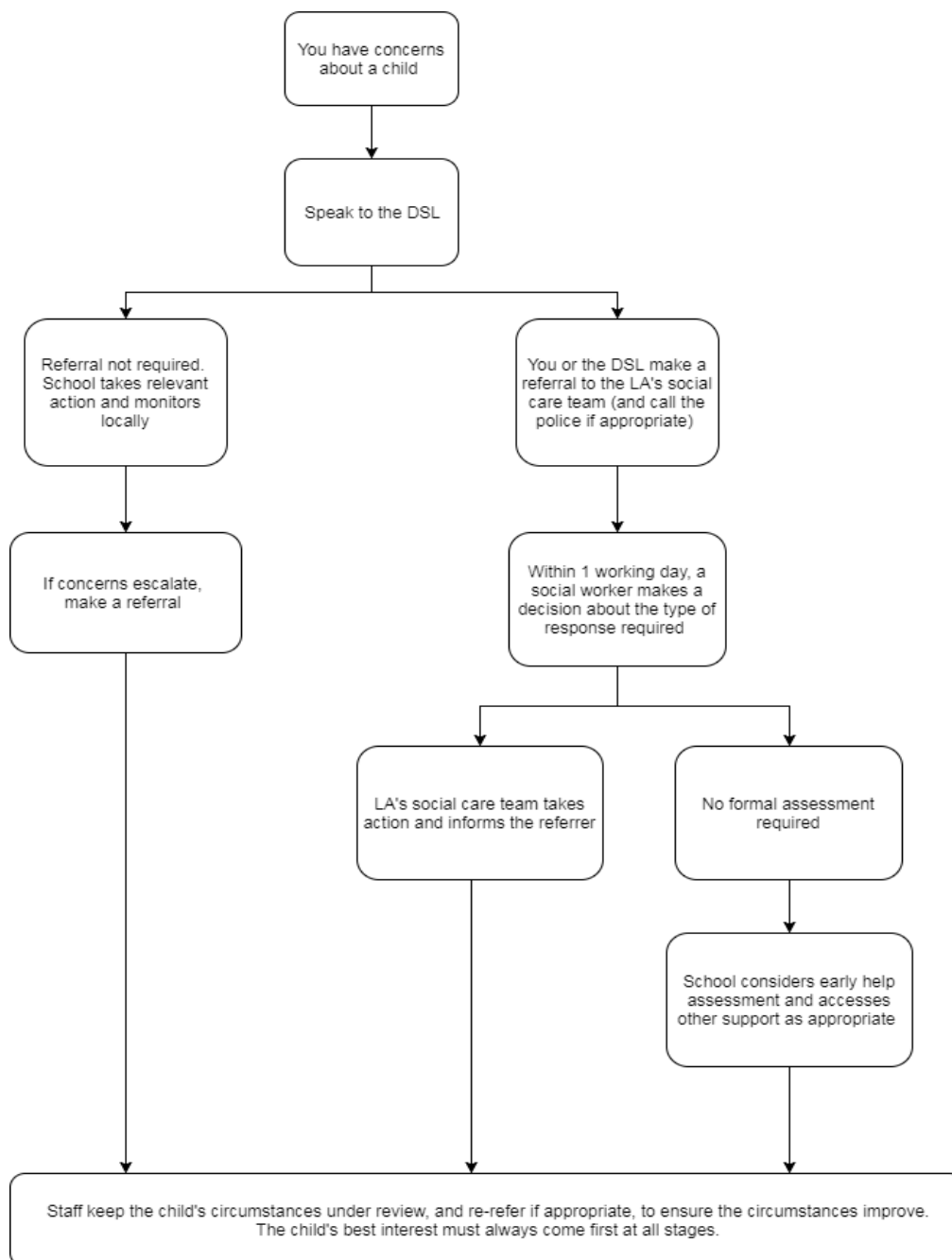
If you have a mental health concern that is **not** also a safeguarding concern, speak to a member of the SLT/ DSL/DDSLs to agree on a course of action.

Approaches to consider.

- Mental Health Drop in services
- SLT support
- Refer students to Listening Service
- Refer to CAMHS.
- Contact worker if already engaging in external mental health services.
- Useful links etc. on website
- Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

## Figure 1: Procedure if you have Concerns about a Child's Welfare (As Opposed to Believing a Child is Suffering or Likely to Suffer from Harm, or in Immediate Danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



### 7.7 Concerns about a Staff Member, Supply Teacher, Volunteer or Contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher (or Deputy Head in the Headteachers absence) as soon as possible.

To maintain confidentiality, you must not speak to anyone else regarding this.

If the concerns/allegations are about the headteacher, speak to the Chair of the Management Committee, if you need support to do this speak to the Deputy Head Teacher.

The Headteacher/Chair of Management Committee will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the Local Authority Designated Officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

## **7.8 Allegations of Abuse Made Against Other Pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our Relationship and Behaviour Policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.
- Is violent.
- Involves pupils being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

### **Procedures for Dealing with Allegations of Child-on-Child Abuse**

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation on CPOMS and inform a member of the senior leadership team who will consult with the DSL/DDSs, but do not investigate it.
- The SLT member in consultation with the DSL/DDSs will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The SLT member in consultation with the DSL/DDSs will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The SLT member in consultation with the DSL/DDSs will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Any information must be recorded on CPOMS to ensure there is a clear chronology. The DSL/DSL will review this constantly with relevant SLT members and any other relevant staff.

## Creating a Supportive Environment and Minimising the Risk of Child-on-Child Abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously.
- Be alerted to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here.”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report.
    - A member of staff may overhear a conversation.
    - A child’s behaviour might indicate that something is wrong.
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
  - That they should speak to the DSL/DDSLs/SLT if they have any concerns
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

The DSL/DDSLs will take the lead role in any support/actions/consequences/sanction of the alleged perpetrator(s).

The DSL/DDSLs will liaise with other professionals regarding whether this can take place while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

## 7.9 Sharing of Nudes and Semi-Nudes ('Sexting')

Our approach is based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

### Your Responsibilities when Responding to an Incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to a SLT who will alert the DSL/DDSLs immediately and who will then support with the incident. You must also log your concerns on CPOMS.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL/DDSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from SLT member/ DSL/DDSLs.

### Initial Review Meeting

Following a report of an incident, the DSL/DDSLs will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response?
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment.

- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL /DDSLs will make an immediate referral to police and/or children's social care if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL/DDSLs knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13.
- The DSL/DDSLs has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL/DDSLs, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded on CPOMS, in line with the procedures set out in this policy.

### **Further Review by the DSL/DDSLs**

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing Parents/Carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the Police**

If it is necessary to refer an incident to the police, this will be done through dialing 101.

(If other agencies are already involved such as CSC or Early Help, we would consider contacting them as they have Police attached to their team)

### **Recording Incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on our CPOMS system - separate logs made on individual students' pages if the incident involves other students.

### **Curriculum Coverage**

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering.
- Challenging victim-blaming attitudes

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationship's education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality
- The risk of damage to people's feelings and reputation

Students are also taught the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident.

## **7.10 Reporting Systems for Students/The Views of Our Students**

Our student's views are very important to us. We ensure that our students know that our staff are always prepared to listen to them. Students are reminded to report any concerns verbally and/or through any member of staff or through class procedures such as 'Worry Boxes'. We also have consultations with students or encourage them to complete an anonymous questionnaire (age appropriate) that specifically asks them to report how safe they feel at The Alternative Provision Service. We use the findings to inform our Development Plan, Curriculum Developments and specific interventions for individual children.

At The Alternative Provision Service, we recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we:

- Have put systems in place for pupils to confidently report abuse - SLT/ Worry Boxes/Online Safety Concerns Reporting.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils via posters across the service/our website and in lessons.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- Have regular form time/PSHE activities to ensure students are prepared to make informed choices.

- Arrange for visitors or visits to sessions such as Drug awareness/CSE etc.

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

## 8. Online Safety, Filtering and Monitoring and the Use of Mobile Technology

At The Alternative Provision Service, we recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Management Committee members.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### The 4 Key Categories of Risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

### To Meet Our Aims and Address the Risks Above We:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training regularly.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:



- Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present.
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers, and Management Committee members aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
  - Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
  - Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
  - Have in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems, which is reviewed regularly with the Local Authority as our ICT provider Carry out regular reviews of our approach to online safety, supported by a risk assessment that considers and reflects the risks faced by our school community. (Use SWGLA resources)

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy.

## 9. Notifying Parents or Carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The SLT member supported by our DSL/DDSLs will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL/DDSLs.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL/DDSLs will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g., moving them out of classes with the victim, and the reason(s) behind any decision(s)

## 10. Pupils with Special Educational Needs, Disabilities or Health Issues

We recognise that pupils with SEND, or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation, and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.

- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- Communication barriers and difficulties in managing or reporting these challenges.

We offer extra support for these pupils. This includes:

- Strategies identified from assessments on EHCP Plans, Individual Learning Plans etc.
- SLT Support
- Small Group Teaching and SSA support
- Regular reviews by SENCO
- Referrals to Youththerapy
- Close working relationships with CAMHS

Any abuse involving pupils with SEND will require close liaison with the DSL/DDSLs and the SENCO.

## 11. Pupils with a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

### Children who already have a Social Worker/CSC Worker

Our SLT liaises regularly with relevant professionals, updating them on any information from school. They contact directly regarding things such as

Examples of information shared are:

- Details of any face to face, phone or virtual contact with the child
- Any unsuccessful contact e.g., home visit when the child was not present or an appointment that they were not brought to.
- Any change of circumstances in service provision e.g., the child is not currently in school.
- Any change in the child's circumstances

When we are aware that a pupil has a social worker, we work closely with them (and any other professionals) to share information regarding day-to-day information wellbeing etc. Relevant staff attend Case Conferences, Core Groups and Strategy Meetings as required. Our DSL/DDSLs regularly review the support offered by us and others with the relevant members of the SLT and other key staff as appropriate. We liaise closely with the students' Social Worker to ensure any relevant information is shared. We always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- The provision of pastoral and/or academic support

## 12. Looked-After and Previously Looked-After Children

Our Designated Teacher, Robert Vaughan, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

We ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. We will ensure that:

- Appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- Our Designated Teacher has details of children's social workers and relevant virtual school heads, and these are also recorded on CPOMS.
- Our Designated Teacher is appropriately trained and has the relevant qualifications and experience to perform the role. As part of their role, the designated teacher will:
  - Work closely with our DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
  - Work with virtual school heads/teams to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

## **13. Complaints and Concerns about our Safeguarding Policies**

### **13.1 Complaints Against Staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

### **13.2 Other Complaints**

See Policy

### **13.3 Whistleblowing**

See Policy

## **14. Record-Keeping**

We will hold records in line with our records retention schedule set out by the DPO within the Local Authority.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing (electronically). If you are in any doubt about whether to record something, discuss it with the DSL.

### **Digital Recording: CPOMS**

CPOMS is a software application for recording and monitoring child protection, safeguarding and a whole range of pastoral/welfare issues. We use CPOMS across The Alternative Provision Service to:

- Record incidents/information linked to behaviour, child to child abuse, sexualised behaviour, family contact, social information, presentation etc.
- Log records of meetings such as Core Groups, Case Conferences, 'EARLY HELP' reviews and internal meetings
- Share information with relevant staff at The Alternative Provision Service
- Share information with other relevant professionals
- Log Child Protection concerns, actions and follow ups.
- Record outcomes of safeguarding supervision sessions
- Monitor levels of need in classes/ year groups
- Monitor types of need across The Alternative Provision Service
- Share with new school when a child moves setting.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff must discuss these with the DSL/DDSL. We also hold some paper files for children on a Child Protection Plan, CIN Plan or Early Help Support for any paperwork we have such as copies of Plans, Minutes of meetings and other relevant information are stored in these files which are kept in a locked filing cabinet. Historic files that are forwarded to us are also stored in locked filing cabinets.

Records will include:

- . A clear and comprehensive summary of the concern
- . Details of how the concern was followed up and resolved.
- . A note of any action taken, decisions reached and the outcome ('instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc')

Concerns and referrals will be kept in a separate file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. (See A-Zs on Google Drive)

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom we have, or have had, safeguarding concerns moves to another school, our SLT/ DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. If the school is on CPOMs this is done electronically, otherwise information is downloaded and shared either electronically or by delivery.

To allow the new school/college to have support in place when the child arrives, this should be within:

- . **5 days** for an in-year transfer, or within
- . **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the SLT Member/DSL/DDSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Students moving to college - we are developing an agreed protocol with the college/6th form regarding sharing of information.

In addition:

- . Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.
- . Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## 15. Training

### 15.1 All staff

All staff members will undertake safeguarding child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- . Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- . include regular updates and briefings.
- . Be in line with advice from the 3 safeguarding partners.
- . Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment.
  - Have a clear understanding of the needs of all pupils.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism' and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins, and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

### **15.2 The DSL/DDSLs**

The DSL and DDSLs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

### **15.3 Management Committee**

All Management Committee Members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- . Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- . Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

As the Chair of the Management Committee may be required to act as the 'investigating officer' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

### **15.4 Recruitment – Interview Panels**

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

### **15.5 Staff who have Contact with Pupils and Families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## The Views of Our Staff

At The Alternative Provision Service, staff views are important to us. We ensure staff know that leaders are prepared to listen to them. Staff are aware that they should report any concerns verbally and/or written. We use staff voice to contribute to the shaping of our Development Plan, curriculum developments and specific interventions for individual children.

If concerned about poor or unsafe practice and potential failings in our safeguarding offer, staff and volunteers have a duty to raise concerns/follow the **Whistle blowing procedures**. The **NSPCC Whistleblowing helpline** is available for staff who feel they are unable to raise concerns internally 0800 0280285/ help@nspcc.org.uk

## Safeguarding Supervision

Our DSL is Safeguarding Supervision trained. They regularly conduct supervision with all relevant staff, which includes the:

- supervision and development of safeguarding practices.
- review of caseload of families
- setting of new actions/next steps set as appropriate.
- taking of decisions as to need for escalation/de-escalation.
- review of CPOMS logs to support early identification of need.

## Safeguarding Audit

It is recommended that all schools/academies undertake the self-evaluation SECTION 175 self-Audit and the outcomes of such are reflected in developments / training / priority actions within The Alternative Provision Service.

We also complete other audits as appropriate to ensure best practice.

## Case Reviews/Reviews

We are committed to taking account of any recommendations made from local and national Case Reviews and share appropriate recommendations with relevant staff. We are aware that we may become involved in a Case Review, and we are committed to supporting the process. As such, we ensure that the files and records that pertain to a child involved in an incident that may lead to a Case Review are preserved on site and we will cooperate with the representatives from the agency who are undertaking the review.

## 16. Monitoring Arrangements

This policy will be reviewed **annually** by our DSL. At every review, it will be approved by the full Management Committee.

Our Management Committee oversees the Headteacher's sound maintenance of all safeguarding procedures in line with this policy and procedures. The Headteacher has the day-to-day responsibility for maintaining these procedures with the backing of the Management Committee. Our Management Committee will advise the Headteacher of its views on specific issues that will promote safeguarding at The Alternative Provision Service. This may for example be around promoting a parental understanding of the agenda. Our Management Committee does not discuss any individual cases and never requests to see individual pupil records, although they do ask the Headteacher to explain the effectiveness of their procedures.

Our Single Central Register is monitored termly internally and externally (see SCR for record)

## 17. Links with Other Policies

This policy links to the following policies and procedures:

- . Relationships and Behaviour
- . Staff behaviour (code of conduct)
- . Complaints
- . Health and safety
- . Attendance (pupils)
- . Online safety policy
- . Equality in employment
- . Relationships and Sex Education
- . First Aid
- . Curriculum intent
- . Our Children and Previously Looked After Children Procedures
- . Privacy notices

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.**

## **Appendix 1: Types of Abuse**

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

**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.

**Emotional Abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- 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 participating in normal social interaction.
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**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.
- 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 (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.

**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 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 caregivers)
- Ensure access to appropriate medical care or treatment.

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



## Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures

### Recruitment and Selection Process

To make sure we recruit suitable people, we ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

#### Advertising

When advertising roles, we make clear:

- . Our commitment to safeguarding and promoting the welfare of children.
- . That safeguarding checks will be undertaken.
- . The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children.
- . Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

#### Application Forms

Our application forms:

- . Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- . Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.

#### Shortlisting

Our shortlisting process involve at least 2 people and:

- . Consider any inconsistencies and look for gaps in employment and reasons given for them.
- . Explore all potential concerns.

Once we have shortlisted candidates, we ask shortlisted candidates to:

- . Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- . Sign a declaration confirming the information they have provided is true.
- . We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

## Seeking references and checking employment history

We will obtain references before the interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees.
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Resolve any concerns before any appointment is confirmed.

## Interview and Selection

When interviewing candidates, we:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently and ask candidates to explain this.
- Explore any potential areas of concern to determine the candidate's suitability to work with children.
- Record all information considered and decisions made.

## Pre-appointment vetting checks

We record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### New Staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

### **Existing Staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e., they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Staff to complete an annual recertification - no change to DBS status.

DBS renewed at least every 10 years as best practice.

### **Agency and Third-Party Staff**

We obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We also check that the person presenting themselves for work is the same person on whom the checks have been made.

## **Contractors**

We ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- . An enhanced DBS check with barred list information for contractors engaging in regulated activity.
- . An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks are not allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

## **Trainee/Student Teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **Volunteers**

We:

- . Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- . Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- . Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
- . Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

## **Management Committee**

All Management Committee members have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All Management Committee Members will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor)

### **Staff Working in Alternative Provision Settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### **Adults who Supervise Pupils on Work Experience**

When organising work experience, we work with Education Business Partners who ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Pupils staying with Host Families**

We do not usually make arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), but if we did, we would request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## **Appendix 3: Allegations of Abuse Made Against Staff**

### **Section 1: Allegations that may Meet the Harms Threshold**

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- . Behaved in a way that has harmed a child, or may have harmed a child, and/or
- . Possibly committed a criminal offence against or related to a child, and/or
- . Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- . Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our Local Authority Designated Officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

An 'investigating officer' will be appointed by the Head Teacher/Chair of the Management Committee to lead any investigation in line with the complaints policy and or the disciplinary procedure. In all cases the Investigating officer will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgment.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

### **Suspension of the Accused until the Case is Resolved**

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- . Redeployment within the school so that the individual does not have direct contact with the child or children concerned.
- . Providing an assistant to be present when the individual has contact with children.
- . Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- . Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.
- . Temporarily redeploying the individual to another role in a different location, for example to an alternative site.

If in doubt, the investigating officer will seek views from the school's personnel adviser and the Designated Officer at the Local Authority, as well as the police and children's social care where they have been involved.

## Definitions for Outcomes of Allegation Investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for Dealing with Allegations

In the event of an allegation that meets the criteria above, the investigating officer will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below!
- Discuss the allegation with the Designated Officer at the Local Authority (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The investigating officer may, on occasion, consider it necessary to involve the police *before* consulting the Designated Officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the investigating officer will notify the Designated Officer (LADO) as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the investigating officer will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the Designated Officer (LADO), police and/or children's social care services, as appropriate.
- Where the investigating officer is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- **If an immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the Designated Officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the Designated Officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. EAP/trade union representatives, or a colleague etc.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The investigating officer will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If we are made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Additional Considerations for Supply Teachers and all Contracted Staff**

If there are concerns or an allegation is made against someone not directly employed by The Alternative Provision Service, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The Management Committee will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.



However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

## **Specific Actions**

### **Action following a Criminal Investigation or Prosecution**

The investigating officer will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### **Conclusion of a Case where the Allegation is Substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals Returning to Work after Suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the investigating officer will consider how best to facilitate this.

The investigating officer will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

### **Unsubstantiated, Unfounded, False or Malicious Reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false, or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

### **Unsubstantiated, Unfounded, False or Malicious Allegations**

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and investigating officer will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

## **Confidentiality and Information Sharing**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The investigating officer will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

## Record-Keeping

The investigating officer will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

## References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
- Include substantiated allegations, provided that the information is factual and does not include opinions.

## Learning Lessons

After any cases where the allegations are *substantiated*, the investigating officer will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the investigating officer will consider the facts and determine whether any improvements can be made.

## Non-Recent Allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

## **Section 2: Concerns that do not meet the Harm Threshold**

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- . Suspicion
- . Complaint
- . Safeguarding concern or allegation from another member of staff
- . Disclosure made by a child, parent or other adult within or outside the school.
- . Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of Low-Level Concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- . Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- . Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- . Being overly friendly with children
- . Having favourites
- . Taking photographs of children on their mobile phone
- . Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- . Humiliating pupils

### **Sharing Low-Level Concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We create this culture by:

- . Ensuring staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- . Empowering staff to share any low-level concerns as per section 7.7 of this policy.
- . Empowering staff to self-refer.
- . Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- . Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- . Helping to identify any weakness in the school's safeguarding system - supervisions, staff meetings, questionnaires and audits.

## Responding to Low-Level Concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern unless it has been raised anonymously.
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy (code of conduct). The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

## Record Keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaf's employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

## Appendix 4: Specific Safeguarding Issues

### Assessing adult-involved nude and semi-nude sharing incidents

(This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).)

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

#### Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chat rooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made.

To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person.
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images.
- Moved from a public to a private/E2EE platform.
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes.
- Offered something of value such as money or gaming credits.
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images.

#### Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them.
- Use images that have been stolen from the child or young person taken through hacking their account.
- Use digitally manipulated images, including AI-generated images, of the child or young person.

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person.
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first.
- Moved from a public to a private/E2EE platform.
- Pressured into taking nudes or semi-nudes.
- Told they have been hacked and they have access to their images, personal information, and contacts.
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

### **Children who are Absent from Education**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect.
- Are at risk of forced marriage or FGM.
- Come from Gypsy, Roma, or Traveller families.
- Come from the families of service personnel.
- Go missing or run away from home or care.
- Are supervised by the youth justice system.
- Cease to attend a school.
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect.

identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child Criminal Exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child Sexual Exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- . Having an older boyfriend or girlfriend
- . Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child-on-Child Abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- . Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- . Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- . Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- . Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- . Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- . Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- . Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- . Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- . Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.



When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

### **Domestic Abuse (Operation Encompass/PVP/PSRs)**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological, or emotional. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects'.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) through Operation Encompass and PVP/PSR. These updates usually arrive before the child or children arrive at school the following day. The DSL/SLT will provide support according to the child's needs and update records about their circumstances.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL/DDSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **So-called 'Honour-Based' Abuse (including FGM and Forced Marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- . A pupil confiding in a professional that FGM has taken place.
- . A mother/family member disclosing that FGM has been carried out.
- . A family/pupil already being known to social services in relation to other safeguarding issues.
- . A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school or absent for a prolonged period.
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations.
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- . The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- . FGM being known to be practised in the girl's community or country of origin.
- . A parent or family member expressing concern that FGM may be carried out.
- . A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- . A girl:
  - Having a mother, older sibling or cousin who has undergone FGM.
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman."
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

## Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e., we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- . Speak to the pupil about the concerns in a secure and private place.
- . Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- . Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- . Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

## Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK

## Preventing Radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  - Negate or destroy the fundamental rights and freedoms of others; or
  - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points.
- . **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people.
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism extremist. Radicalisation can occur quickly or over a long period.

Staff will be alerted to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy.
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures,

## **Sexual Violence and Sexual Harassment between Children in Schools**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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 and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
- Regularly review decisions and actions, and update policies with lessons learnt.
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and gender questioning (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

## **Serious Violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school.
- Having experienced child maltreatment

- Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

### **Checking the Identity and Suitability of Visitors**

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to us, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in on the DigiGreet (this can be set up prior to their arrival)/ and wear a visitor's badge.

Visitors to The Alternative Provision Service who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### **Non-collection of Students**

Most of our students are able to go home by themselves at the end of the day or on transport arranged for them. However, if a student is not collected at the end of the session/day, we:

- Phone parents/carers
- Phone other contact numbers
- Contact Pupil Welfare Team to support.
- support with transport home

### **Missing Pupils**

Our procedures are designed to ensure that a missing student is found and returned to effective supervision as soon as possible. If a student goes missing/decides to leave our property, we:

- Phone parents/carers
- Phone other contact numbers
- Contact the police if required to support.
- Contact Pupil Welfare Team to support.
- If this becomes a regular thing, the student's risk assessment is adapted to reflect this and our actions.

