

SAFEGUARDING & CHILD PROTECTION POLICY

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POLICY LEAD	Matt Phillips	
POLICY AUTHOR (if different from above)		

POLICY CONTEXT

- This Safeguarding and Child Protection Policy sets out the campus's commitment to Safeguarding and Promoting the Welfare of Children and Keeping Children Safe in Education.
- At Focus School Gloucester Campus we will provide a safe and welcoming environment where every child and young person is respected and valued. It is the responsibility of everyone to be alert to the signs of abuse and neglect in all its forms and to follow the procedures in place to ensure that children receive timely and effective support, protection and justice.
- The purpose of this policy and procedures is to provide clear priorities for safeguarding and promoting students' welfare in accordance with our moral duty and statutory guidance.

POLICY REQUIREMENT (see Section 2)

- This Policy applies to all staff, trustees, volunteers, visitors and parents of both current and prospective students in the Campus. The Policy and Procedures are consistent with those of the Local Safeguarding Children Board. The Policy is available on the school website and is made available to all staff, trustees, volunteers, parents both current and prospective and visitors to the school.
- The requirements of this policy are to:
 1. Make certain that the schools responsibility to safeguard and promote the welfare of children is of paramount importance
 2. Protect children and others from maltreatment or harm – in all its forms - and keep children safe
 3. Make individual responsibilities crystal clear - in identifying and reporting possible cases of abuse
 4. Provide a systematic means of monitoring, recording and reporting of concerns and cases
 5. Provide guidance on recognising and dealing with suspected child abuse and advise precisely what to do if anyone has a concern about a child's welfare
 6. Provide a framework for inter-agency communication and effective liaison
 7. Identify strategies and early help interventions available to support children at risk
 8. Ensure that any deficiencies or weaknesses in child protection arrangements are remedied without delay
 9. Ensure that safe recruitment procedures are implemented
 10. Comply with locally agreed inter-agency procedures and National Guidance

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1 INTRODUCTION

1.1 Rationale

1.1.1 This Safeguarding and Child Protection Policy sets out the campus's commitment to Safeguarding and Promoting the Welfare of Children and Keeping Children Safe in Education. This policy is one of a series of associated policies in place within the campus.

1.1.2 At Focus School Gloucester Campus we recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect, in all of its forms. We follow stringent procedures to ensure that children receive effective education, support, protection and justice.

Statutory Guidance

1.1.3 The **Teacher Standards 2012** state that teachers, including Head Teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

1.1.4 The DfE Guidance, **Keeping Children Safe in Education (2016)**, sets out the legal duties and procedures and will be implemented at Focus School Gloucester Campus. This includes procedures related to Regulated Activity, pre-employment checks including DBS checks, volunteers and allegations against staff.

1.1.5 **Keeping Children Safe in Education, September 2016** guidance is applied at Focus School Gloucester Campus alongside **Working Together to Safeguard Children, A Guide to Inter-agency Working issued March 2015** which emphasises that effective safeguarding systems are those where:

- The **child's needs are paramount**, and the needs and wishes of each child should be put first, so that every child receives the support they need before a problem escalates
- **All professionals who come into contact with children and families** are alert to their needs and any risks of harm that individual abusers, or potential abusers, may pose to children
- **All professionals share appropriate information in a timely way** and can discuss any concerns about an individual child with colleagues and local authority children's social care
- **High quality professionals are able to use their expert judgement** to put the child's needs at the heart of the safeguarding system so that the right solution can be found for each individual child
- **All professionals contribute to whatever actions are needed** to safeguard and promote a child's welfare and **take part in regularly reviewing the outcomes** for the child against specific plans and outcomes
- **Local areas innovate** and changes are informed by evidence and examination of the data, serious case reviews and thematic case reviews.

1.1.6 In addition, other key guidance underpins our policy and procedures for keeping children safe. In particular:

- Prevent Duty Guidance: for England and Wales, 2015
- DfE Children Missing in Education (September 2016)
- The UKCCIS (2016) guidance 'Sexting in Schools and Colleges: responding to incidents and safeguarding young people'.

- 1.1.7 This policy and procedures aims to outline the role that the Campus will have, the procedures that staff should take and guidance on issues related to child protection generally. It is not exhaustive. All staff should consider sensitively the needs and safety of the child as being at the centre of any decision they make.
- 1.1.8 In most cases this will be the referral of concerns to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. For concerns about adults who work with our students, the Head Teacher should be informed immediately. In day-to-day contact with children at risk, staff have an opportunity to note concerns and to meet with parents and other associated adults.

1.2 Scope

- 1.2.1 This Policy and Procedures applies to all staff, trustees, volunteers, visitors and parents of both current and prospective students in the Campus.
- 1.2.2 The Policy and Procedures are consistent with those of the Local Safeguarding Children Board.
- 1.2.3 The Policy is available on the school website and is made available to all staff, trustees, volunteers, parents both current and prospective and visitors to the school as appropriate.
- 1.2.4 The Safeguarding Audit (Checklist) will be completed at least once per term or when there has been a change of policy or staffing; all resulting actions must be resolved immediately.

1.3 Principles

- 1.3.1 The Campus/Trust positively supports individuals with learning development needs and ensures that no student is prevented from accessing a broad and balanced curriculum. Staff will work collaboratively with colleagues from learning development services and other organisations, in order to ensure that students have a positive and progressive educational experience
- 1.3.2 At Focus School Gloucester Campus, we never believe 'it won't happen here'. To properly safeguard all of our children and young people, we will always consider the unthinkable and we will report every concern, including a 'nagging doubt', in line with our procedures. Effective safeguarding arrangements at Focus School Gloucester Campus will be underpinned by our **three key principles**:
- **A child-centred approach.** The welfare and needs of children are paramount in all circumstances.
 - Safeguarding and child protection is **everyone's responsibility**
 - **Highly effective and timely Communication** at all times
- 1.3.3 Our organisational culture will be one of **highly consistent and collective vigilance** for the safety and wellbeing of the children in our care, for every child every day. Our collective threshold for reporting concerns of all types – be it related to behaviour of adults or concerns about children and families – needs to be low. Even nagging doubts may build into a pattern of information which is concerning. We all have a duty to bring forward concerns confidentially and in line with the policy.
- 1.3.4 At Focus School Gloucester Campus we will provide a safe environment for students both under and over 18 especially those who are considered vulnerable.
- 1.3.5 We will provide all staff with the necessary information to enable them to meet their child protection responsibilities, ensure consistent good practice and demonstrate our commitment with regard to Child Protection to students, parents and other partners.

2 POLICY

- 2.1** This Safeguarding and Child Protection Policy sets out the campus's commitment to Safeguarding and Promoting the Welfare of Children and protecting children from abuse in Education. This policy is one of a series of associated policies in place within the campus.
- 2.2** At Focus School Gloucester Campus we recognise our moral and statutory responsibility to safeguard and promote the welfare children. We are committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice. We are alert to the signs of abuse and neglect and follow our procedures to ensure that every child receives effective support, protection and justice.
- 2.3** Safeguarding is everyone's responsibility and effective safeguarding arrangements at Focus School Gloucester Campus will be underpinned by three key principles:
- 2.3.1 A child-centred approach.** The **welfare and needs of children are paramount** in all circumstances.
- 2.3.2 Everyone** employed and who comes into contact with children at Focus School Gloucester Campus has a responsibility in relation to safeguarding and to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- 2.3.3 Communication** about child protection and safeguarding issues will be timely, clear and will follow statutory guidance from Gloucestershire Safeguarding Children's Board (GSCB). Information sharing will ensure communication with all stakeholders has been considered. Decisions about information sharing will be made carefully, checked with external children's services agencies and recorded.
- 2.4** Focus School Gloucester Campus acknowledges that some children, including disabled children and those with Special Educational Needs, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.
- 2.5** As part of our safeguarding policy Focus School Gloucester Campus will:
- 2.5.1** Promote and prioritise the safety and wellbeing of children and young people
- 2.5.2** Provide a safe environment for students both under and over 18 especially those who are considered vulnerable.
- 2.5.3** Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse in all its forms, neglect and other safeguarding concerns relating to children and young people
- 2.5.4** Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern
- 2.5.5** Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- 2.5.6** Prevent the employment/deployment of unsuitable individuals
- 2.5.7** Ensure robust safeguarding arrangements and procedures are in operation.
- 2.6** The policy and procedures will be widely promoted and are mandatory for everyone involved in Focus School Gloucester Campus. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

Monitoring

- 2.7** The Safeguarding Audit (Checklist) will be completed at least once per term or when there has been a change of policy or staffing; all resulting actions must be resolved immediately.
- 2.8** The policy will be reviewed a year after development and then every three years, or in the following circumstances:
- 2.8.1** changes in legislation and/or government guidance
- 2.8.2** as required by the Local Safeguarding Children Board or education regulators
- 2.8.3** as a result of any other significant change or event.
- 2.9** This policy and procedures aims to outline the role that the Campus will have, the procedures that staff should take and guidance on issues related to child protection generally. It is not exhaustive. All staff should consider sensitively the needs and safety of the child as being at the centre of any decision they make.

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Roles & Responsibilities (full details in section 4)

3.1 The Board of Trustees

- 3.1.1** Part 2 The Management of Safeguarding – provides guidance for the Board of Trustees on their responsibility as the proprietor to ensure policy, practice and training is in place. The Board of Trustees will appoint a Safeguarding Trustee to oversee this.
- 3.1.2** The Board of Trustees and proprietorial body must safeguard and promote the welfare of children (everyone under the age of 18) to protect them from maltreatment, to prevent impairment of children’s health or development ensuring that children grow in circumstances consistent with the provision of safe and effective care and taking action to enable children to have the best outcomes. They must ensure that policy, practice and training is in place.
- 3.1.3** The Board of Trustees will appoint a Safeguarding Trustee to oversee that the policy and procedures, practice and training is in place and embedded across the campus.
- 3.1.4** The appointed trustee will report back to the Board of Trustees on a regular basis.
- 3.1.5** Trustees must ensure that they meet the requirements as detailed in the Campus Information and Self Evaluation Tool and the Safeguarding Audit (Appendix 2) which covers the following Child Protection areas: recruitment and selection including pre-

employment vetting checks, Single Central Record, welfare health and safety including educational visits, off-site activities, fire safety, first aid, supervision and premises and accommodation, behaviour management, attendance and admissions, complaints and quality of organisation and management.

- 3.1.6** The Board of Trustees will ensure that there is a mechanism in place to assist all staff, including trustees and volunteers understand and discharge their role and responsibilities to Safeguarding in line with the Keeping Children Safe in Education (Part 1).
- 3.1.7** Prior to the appointment of a new Chair of the Board of Trustees, the Secretary of State will carry out an additional Enhanced DBS check. The Board must ensure that the DfE is kept informed of changes.

The Safeguarding Trustee is: Mr Guy Knappett

The HR Trustee who has been delegated the responsibility for Safer Recruitment is: Mr Guy Knappett

The Head Teacher is: Mr Tom Neave

The Designated Safeguarding Lead is: Mr David Walters

The Deputy Designated Safeguarding Lead are: Mr Tom Neave and Mrs Joséé Latham.

3.1.8 The Designated Safeguarding Lead will:

- be a senior member of the campus staff on the leadership team. Except in agreed circumstances, the Head Teacher should not be the lead DSL, however should be kept informed of on-going investigations
- have Designated Safeguarding Lead role defined as an appendix to their job description
- be **trained as a Designated Safeguarding Lead** by the Local Authority where the school is based (Gloucestershire Safeguarding Children's Board)
- be registered for child protection and safeguarding updates from the local authority in each student locality
- attend training in referral procedures for the local authority in each student locality

3.1.9 The Deputy Designated Safeguarding Lead will:

- be a member of the campus staff (Teaching or Support staff). This may also be the Head Teacher.
- have Deputy Designated Safeguarding role defined as an appendix in their job description
- act in the absence of the Designated Safeguarding Lead
- be **trained as a Designated Safeguarding Lead** by the Local Authority where the school is based (Gloucestershire Safeguarding Children's Board)
- be registered for child protection and safeguarding updates from the local authority in each student locality
- attend training in referral procedures for the local authority in each student locality

There should always aim to be a member of staff of each sex on the DSL team.

- 3.1.10** Focus Learning Trust have a National Safeguarding Committee (refer to section 4), with representation from Head Teachers, a practicing DSL, national leadership team members and the National Safeguarding Lead. This group will review national trends in Child Protection, in order to advise on improvements to Child Protection policy and procedure across Focus Learning Trust Campuses. The National Safeguarding lead will also work with the Head Teacher and Trustees to manage critical incidents at the campus, once referred to the appropriate authorities.
- 3.1.11** There is a National Safeguarding Lead, from Focus Learning Trust (refer to section 4) who is able to advise on the implementation of the policy and procedures, training and auditing of effectiveness. This does not, in any way, replace guidance provided by the LSCB, LADO or Children's Social Care regarding specific referrals. Advice regarding referrals must be directly sought from the LSCB, LADO and Children's Social Care in line with the arrangements in the locality of the campus.

The National Safeguarding Lead is: Mr Matt Phillips (Regional Principal). Mr Andrew Cuckson (National Leadership Team) is the National Leadership Team Member with responsibility for Safeguarding governance.

- 3.1.12** The Regional Principal has delegated professional line management for the Head Teacher (refer to section 4). As such, the Regional Principal will regularly audit safeguarding procedures at Focus Gloucester Campus and will make recommendations, where necessary, for improvement or sharing of good practice. The Regional Principal will have received national DSL Training from the NSPCC. The Regional Principal, unless acting as Head Teacher, will not be expected to advise on specific referrals to the LADO, Children's Social Care or Police as this would delay the process and would conflict with this policy.

The Regional Principal is: Mr Matt Collins

3.2 Safeguarding Training

- 3.2.1** The Safeguarding Trustee and Designated Safeguarding Lead will be responsible for ensuring all staff, trustees and volunteers who work with children undertake the appropriate training; that the Training Log (Appendix 4) is up-to-date, including all new appointments. This includes retaining evidence of the additional training, emails, staff meetings and the sharing of publications to increase knowledge and skills relating to safeguarding.
- 3.2.2** Where the campus is on two sites or in different locations or the Designated Safeguarding Lead is not on site full time, then another member of staff will be required to undergo LSCB Child Protection Training, at Designated Safeguarding Leader (DSL) level.
- 3.2.3** The DSL, Deputy DSL and Safeguarding Trustee in addition to their formal training with the LSCB requirements (every 2 years) must ensure that their knowledge and skills are up-dated by way of the Focus Learning Trust updates, LSCB updates, and DfE updates to guidance. This information should also be shared with all staff by way of emails, e-bulletins, notice boards and staff meetings.
- 3.2.4** Children are taught to keep themselves safe including on-line through teaching and learning opportunities as part of the curriculum.
- 3.2.5** The DSL must maintain a log of all training and up-dates in the development of the skills and knowledge of staff and must ensure that all staff understand the procedures for identifying children requiring early help or intervention.

3.2.6 The Optimus Insight Magazine will be distributed to Safeguarding Trustees, Designated Safeguarding Leads, Deputies and Head Teachers from the Focus National Support Team. It provides up-to-date news, training and case studies in respect of safeguarding.

Levels of Training:

LSCB Training

3.2.7 The Safeguarding Trustee, Designated Safeguarding Lead (DSL) and a Deputy DSL should all receive training in Safeguarding and inter-agency procedures with the LSCB. This will include providing the knowledge and skills to fulfil their responsibilities as Designated Safeguarding Leaders.

3.2.8 When undertaking initial or refresher training consider the 5 Rs to ensure that courses fulfil the necessary aspects required from training:

- Recognising child abuse
- Responding to children
- Reporting concerns – about adults and children
- Recording information
- Making Referrals to children's social care

Basic Training

3.2.9 All staff and volunteers who work with children need to have basic Child Protection Training annually (Appendix 3) that equips them to recognise and respond to child welfare concerns, including institutional grooming, peer on peer abuse, youth produced sexual imagery and online safety. This should be included as part of the induction process of new staff, volunteers and trustees. The training will have an online training element, and a face to face element.

All staff and volunteers will receive e-Safety training, updated annually, and Prevent Duty training using a blend of online and face to face delivery.

Newly Qualified Teachers (NQT)

3.2.10 As part of their induction, the NQT Induction Tutor will ensure that the NQT understands the professional standards and professional distance. All NQT staff will additionally follow at least the basic Safeguarding training for the campus.

NSPCC Training

3.2.11 The NSPCC can provide training for Designated Safeguarding Personnel. The training is not nationally endorsed by any umbrella body of Local Safeguarding Children Boards however, they do provide training to and on behalf of LSCBs. The NSPCC have consulted with the DfE regarding some of their training offerings and adhere to the latest Keeping Children Safe in Education September 2016.

3.2.12 Should you wish to consider the NSPCC training please refer to your LSCB to ensure that the training planned meets the LSCB requirements. NSPCC Course Links: <http://www.nspcc.org.uk/what-you-can-do/get-expert-training/england-designated-safeguarding-lead-for-schools-colleges-england/>

On-line Training for Designated Safeguarding Personnel

3.2.13 Should you wish to consider on-line training for personnel with a Designated Safeguarding Lead role, please ensure that the training meets your LSCB requirements.

Safer Recruitment Training

- 3.2.14** The Head Teacher, Lead CA and HR Trustee must successfully complete an approved 'Safer Recruitment Training' qualification. This must ensure that at least one member of any interview panel has had this training. NSPCC On-line Course Link: <http://www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-education-course/>

E-Safety Training

- 3.2.15** The Head Teacher, designated safeguarding leader and e-safety coordinator (if different from the DSL) should sign up to CEOP and cascade information and updates to the on-line safety group and all staff (ref: IT and E-Safety Policy).
- 3.2.16** The DSL and E-Safety Coordinator (if different from the DSL) will be trained in e-safety using an approved CEOP Course (further details in the ICT & E-Safety Policy) and will cascade through staff training and staff meetings.
- 3.2.17** The course will cover: how children use the internet and technology, the risks children take on-line, harmful content on-line, on-line radicalisation and extremism, sharing and sexting, sexual offending against children on-line, bullying on-line, supporting parents and carers, supporting children and young people, how to make organisations safer places for children to go on-line.

Prevent Duty Training:

- 3.2.18** The DSL or Head Teacher will attend relevant PREVENT Duty training through the Gloucestershire local authority and will ensure this training is cascaded to every staff member. There is an online training course (Channel Awareness) for all staff to use to receive Prevent Duty Training.

Keeping up-to date with skills and knowledge

- 3.2.19** As part of sharing Safeguarding information and keeping all staff updated with skills and knowledge, a Safeguarding Notice Board will be kept in the school Staff Room. It will highlight how the campus will keep children safe, training dates, policies, posters, roles and responsibilities, up-dates and publications on safeguarding such as newsletters, Keeping Children Safe in Education, incident forms and contact details of the safeguarding personnel.

3.3 Staff Training

- 3.3.1** The staff training will ensure:

- staff have read, understood and signed to say they will implement the Campus's Safeguarding and Child Protection Policy and procedures and are alert to the signs of abuse as detailed in this policy
- there is an overarching approach to ensure children are taught about safeguarding, including on-line, through a variety of curriculum opportunities
- that their knowledge and skills are kept up-to-date and the DSL shares update information by additional training, e-mails, staff meetings and sharing of publications relating to safeguarding
- staff have read and understood ALL parts of the Keeping Children Safe in Education guidance (2016). Volunteers should read and understand at least Part 1.
- all concerns are reported in the first instance to the Designated Safeguarding Lead or his/her deputy on the same day. If concerns relate to a staff member, that they are reported immediately to the Head Teacher. If concerns are about the Head Teacher, they should be reported immediately to the Safeguarding Trustee.

- consultation with the Designated Safeguarding Lead or Deputy if in any doubt as to how to proceed
- low level concerns are raised and recorded
- if a child is in immediate danger or is at risk of harm they can make a referral to Children's Social Care and / or the Police immediately (however they should also advise the DSL that they have made a direct referral as soon as possible thereafter)
- that their behaviour and actions do not place students or themselves at risk of harm, or of allegations of harm, to a student
- that risk assessments are carried out (for example, in one-to-one tuition, sports coaching, conveying a student by car, or engaging in electronic communication with a student).
- that all staff have completed the Keeping Children Safe in Education and Safeguarding Policy Questionnaire (appendix 12)

3.3.2 All staff should receive appropriate Child Protection and Safeguarding update training at least annually (as Appendix 3) by the DSL. Topics in the update training should follow the needs of the campus. Training topics will always be discussed with Gloucestershire Safeguarding Children's Board to ensure it addresses all necessary areas.

3.3.3 Safeguarding training will be part of the induction process for all new appointments. This training will always cover: The legal framework including roles and responsibilities, signs, symptoms and categories of child abuse, procedures for managing concerns and listening to children and safer working practice. In addition, specific training about safeguarding issues in a whole-school setting.

3.3.4 Focus School Gloucester Campus will retain evidence of the safeguarding training delivered, including the content, attendance registers and the evaluation process.

3.3.5 It is recognised that staff will build up skills and knowledge by undertaking safeguarding training and managing concerns on a regular basis. Staff will be encouraged to participate and contribute to the safeguarding arrangements in school.

3.4 Good Practice Guidelines and Staff Code of Conduct

3.4.1 The Teacher Standards 2012 state that teachers, including Head Teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their duties.

3.4.2 Good Practice includes:

- treating all children with respect
- setting a good example by conducting themselves appropriately
- involving students in decisions that affect them
- encouraging positive, respectful and safe behaviour among students
- being a good listener
- being alert to changes in students' behaviour and to signs of abuse and neglect
- recognising that challenging behaviour may be an indicator of abuse
- understanding the Safeguarding & Child Protection Policy and other guidance documents on wider safeguarding issues, for example Anti-Bullying, Behaviour, ICT, Camera and Using Images and Mobile Telephone procedures

- asking the student's permission before initiating physical contact, such as assisting with physical support during PE or administering first aid
- maintaining appropriate standards of conversation and interaction with and between students
- applying the use of reasonable force only as a last resort and in compliance with the campus procedures
- referring all concerns about a student's safety and welfare to the DSL and knowing when, if necessary, to direct to police or children's social care
- following the campus's rules with regard to communication with students and use of on-line networking (Refer to the Social Media Policy).

3.5 Keeping Children Safe in Education (KCSIE), September 2016

- 3.5.1** Part 1 Safeguarding Information for all staff – The Keeping Children Safe in Education Guidance must be read, understood and will be used by the campus to assist in establishing a highly effective safeguarding and child protection culture.
- 3.5.2** All staff, including volunteers, and Trustees will undertake the KCSIE 2016 Quiz, which will be signed, dated and recorded along with a statement that they have read and understood the KCSIE 2016 guidance. All staff including new appointments will be trained in safeguarding procedures (Appendix 3) and the requirements of this policy.
- 3.5.3** A copy of the KCSIE (at least Part 1) will be provided to all staff at the start of the Autumn Term or upon their appointment in-year. This will form part of the training for Safeguarding and Child Protection.
- 3.5.4** It will also be included as part of the induction process for all new staff, trustees and volunteers as well as the training (Appendix 3). This will assist all staff in understanding and discharging their role and responsibilities towards safeguarding.

3.6 Helping Children to Keep Themselves Safe including on-line

- 3.6.1** The Byron Review (2008) has classified the main areas of risks as:
- **Content** - exposure to inappropriate or harmful content
 - **Contact** - being subjected to harmful online interaction with other users
 - **Conduct** - personal online behaviour that increases the likelihood of, or causes, harm
- 3.6.2** We will never achieve risk-aware young people who can keep themselves safe, by blocking content. Children at Focus School Gloucester Campus are taught to **recognise, self-reflect and manage risk** through Personal, Social, Health and Economic (PSHE) education lessons and rehearsed throughout all aspects of campus life. The campus approach is designed to help children to think about **risks** they may encounter and, with staff, work out how to self-manage to reduce those risks. This should include:
- discussion about risk, promoting sensible behaviour
 - teaching children how to conduct themselves and how to behave in a responsible manner
 - reminding children about e-safety, mobile devices and tackling bullying procedures
- 3.6.3** The campus promotes an ethos of respect for children and students and they must be aware of who to speak to in confidence about any worries they may have, including electronic reporting with the e-safety button.

3.7 Partnership with Parents

- 3.7.1 It is important that the campus has an established approach to working with parents – for parents' training and for liaison in the event of a child protection concern. Parents' and children's need for privacy should be respected. However, the priority is the needs of the child and effective liaison is crucial for this.
- 3.7.2 It should be recognised that families from different backgrounds and cultures will have different approaches to child-rearing. These differences should be acknowledged and respected provided they do not place the child at risk as defined later in this policy.
- 3.7.3 Where possible, campus staff should work with and share information with parents. Permission for liaison and information sharing with outside agencies should be sought unless it places the child at risk. In these cases it is preferable to seek advice from social care or make a child protection referral.

3.8 Parent Access to Educational Records

- 3.8.1 Other than in exceptional circumstances, campuses must make available for inspection or provide a copy of a student's 'educational record' if requested to do so in writing by a parent or student. This must be supplied within 40 days of a request.
- 3.8.2 Meaning of Educational Record – any information processed relating to the student or former student of the campus which originated from or was supplied by any member of staff, the student themselves or a parent of that student. The Educational Record must not disclose any information which you would be prohibited from sharing with the student themselves under the Data Protection Act or which that the student would have no right to access themselves (consider third party information).
- 3.8.3 In some circumstances access can be refused, for example, providing information about social services or related activities, if disclosure may cause serious harm to the physical or mental health of the student, releasing information that would be likely to prejudice an ongoing criminal investigation or confidential communications between client and professional legal adviser.

3.9 Private Fostering

- 3.9.1 Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed **for 28 days or more** in the care of someone who is not the child's parent(s), a close relative or a 'connected person'. A connected person is defined as a 'relative, friend or other person connected with a child'.
- 3.9.2 To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous but can include occasional short breaks
- 3.9.3 Private foster carers can be from the extended family, e.g. a cousin or a great aunt, **but cannot be a relative** as defined under the Children Act 1989, section 105:
'A relative under the Children Act 1989 is defined as a 'grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or step-parent'.
- 3.9.4 Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.
- 3.9.5 Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

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

3.9.7 On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered, to record this on SIMS and to update records with all changes.

3.10 Guidance on Recognising Abuse

Types of Abuse

3.10.1 Abuse may fall into the categories of physical, emotional (including regular exposure to domestic violence), sexual and neglect. Appendix 5 provides additional guidance relating to recognising the signs of abuse including harmful behaviours linked to safeguarding issues that can put children in danger.

3.10.2 All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label.

3.10.3 Child abuse is a term used to describe ways in which children are harmed by someone, often in a position of power. It is not the responsibility of campus staff to decide whether child abuse is occurring but we are required to act on any concerns, including nagging doubts and report it to the appropriate party. The health, safety and protection of a child are paramount.

3.10.4 Abuse might fall into the categories of:

- physical
- emotional (including regular exposure to domestic violence)
- sexual
- neglect.

3.10.5 See Appendix 5 - Recognising the signs of abuse and specific guidance relating to each of the following:

- types of abuse and neglect and how to recognise them
- bullying and 'cyber-bullying'
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- honour based violence (HBV) including female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence
- mental health
- peer on peer abuse
- radicalisation and extremism

- Youth Produced Sexual Imagery (sexting)
- teenage relationship abuse
- trafficking

3.11 Peer on Peer Abuse

Managing Peer on Peer Allegations

3.11.1 Focus School Gloucester Campus has put in place safeguards to reduce the likelihood of peer on peer allegations. There is an established ethos of moral integrity, respect, friendship, courtesy and kindness with a clear Behaviour Policy and visible staff presence. Gloucester Campus seeks to educate all pupils on healthy relationships through the curriculum. We recognise despite this we need to be alert to peer on peer abuse. Child sexual abuse is a subject many people find very difficult to talk about. The idea that children can sexually abuse others is still very hard for us to accept. The presence of one or more of the following points in situations where there has been sexual activity between children should always trigger some concern:

- There is an age difference of two years or more between the children
- One of the children is significantly more dominant than the other
- One of the children is significantly more vulnerable than the other e.g. in terms of disability, confidence, physical strength
- There has been some use of threats, bribes or coercion to secure compliance or to maintain secrecy

3.11.2 Any peer on peer allegation must be referred to the DSL immediately, using Focus School Gloucester Campus child protection procedures as set out below. Where a concern regarding peer on peer abuse has been disclosed to the DSL(s) advice and guidance will be sought from Children's Social Care. Where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted. Working with external agencies there will usually be a Campus response to the unacceptable behaviour, for example, if a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards will be put in place to promote the well-being of the pupils affected.

3.11.3 In all circumstances, the victim and perpetrator will be provided with support to prevent any reoccurrence of improper behaviour and sanctions will be applied in line with the behaviour policy.

3.12 Children with sexually harmful behaviour

3.12.1 Research suggests that up to 40 per cent of child sexual abuse is committed by someone under the age of 18.

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

3.13 Youth Produced Sexual Imagery (Sexting)

3.13.1 *Appendix 5 provides additional background information on types of youth produced sexual imagery and should be read alongside this procedure:*

3.13.2 In August 2016 the UK Council for Child Internet Safety (UKCCIS) published non-statutory guidance on managing incidents of sexting by under-18s. The UKCCIS

guidance is non-statutory, but should be read alongside 'Keeping children safe in education' (2016). It should be followed unless there's a good reason not to do so.

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

3.13.4 Incidents covered as Youth Produced Sexual Imagery:

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

3.13.5 Incidents not covered by this guidance:

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

Response to incidents of youth produced sexual imagery

3.13.6 Our response should be guided by the 'principle of proportionality' (see glossary)

3.13.7 'The primary concern at all times should be the welfare and protection of the young people involved.' (Sexting in schools and colleges: responding to incidents and safeguarding young people. UKCCIS 2016).

The Law

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

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

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

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

3.13.11 Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. Young people need education, support, and safeguarding, not criminalisation.

3.13.12 The National Police Chiefs' Council (NPCC) is clear that "youth-produced sexual imagery should be primarily treated as a safeguarding issue."

3.13.13 Schools may respond to incidents without involving the police. (However, in some circumstances, the police must always be involved.)

3.13.14 Incidents of youth produced sexual imagery can broadly be defined as either ‘experimental’ or ‘aggravated’ (Wolak and Finkelhor, 2011), which are defined in more detail in **Appendix 5**.

Responding to Incidents of Youth Produced Sexual Imagery:

3.13.15 When responding to incidents of youth produced sexual imagery, all adults in school should:

- Reassure the victim
- Notify the Designated Safeguarding Lead as soon as possible
- Once informed, the Designated Safeguarding Lead should:
 - Review the situation and determine the incident category (e.g. aggravated or experimental).
 - Any incident categorised as ‘Aggravated: Adult involved’ must be referred to the Multi-Agency Safeguarding Hub immediately, for the locality the pupil resides (see appendix 10b)
 - Incidents categorised as ‘Aggravated: Youth Only’ should be considered very carefully by the Designated Safeguarding Leader, to establish whether further referral is needed (**see ‘red flags’ below**).
 - Inform parents or carers as early as possible, unless doing so will put the young person at risk of harm. Any decision not to inform parents or carers should be made in conjunction with Children’s Social Care and/or the police. The Designated Safeguarding Lead should work with the young person to decide on the best approach for informing parents or carers.
 - Decide whether onward referral is required (e.g. police or children’s social care). If a child involved is already open to children’s social care, the relevant social worker should be informed.
 - If an incident has occurred outside of school consideration should be given to whether information should be shared with the Designated Safeguarding Lead at the child or young person’s school.
 - The family and young person should be consulted and advised when this information is being shared.
 - The Designated Safeguarding Lead should formally consider how to support all of the young people involved (see Appendix 5)

3.13.16 Incidents involving **any of the following red flags** must be referred immediately to the Multi-Agency Safeguarding Hub:

- The incident involves an adult
- There is reason to believe that the 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 you know about the image suggests that the content depicts sexual acts which are unusual for the young person’s developmental stage or are violent
- The imagery involves sexual acts
- The young person has had previous involvement in an incident of youth produced sexual imagery

- You have reason to believe that a pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal

Viewing images – DO NOT

3.13.17 View youth-produced sexual imagery. Instead, respond to what you have been told the image contains. Images should be handed to the police if it is felt they need to be viewed.

3.13.18 Never copy, print, or share the image (it's illegal)

Deleting images (from devices and social media)

3.13.19 If the school has decided that involving other agencies is not necessary, consideration should be given to deleting the images.

3.13.20 It is recommended that pupils are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated.

3.13.21 Any refusal to delete the images should be treated seriously, reminding the pupil that possession is unlawful.

Recording Incidents

3.13.22 All incidents relating to youth produced sexual imagery should be recorded securely in the Child Protection file – both on the child's chronology sheet and incident report section. This includes incidents that have been referred to external agencies (MASH or Police). Records should include an overview of the incident, details of the young people involved and any action taken by the agency in responding to the incident. Where the school decides not to refer the incident to the Multi-Agency Safeguarding Hub or Police, their justification should be clearly recorded.

3.13.23 Reference should be made to the Behaviour Management Policy including Cyber Bullying and the DfE Guidance issued in September for Searching, Screening and Confiscation:

- <https://www.gov.uk/government/publications/searching-screening-and-confiscation>

3.14 Female Genital Mutilation

3.14.1 The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

3.14.2 Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

3.15 Safeguarding Students on Work Experience

3.15.1 The safeguarding of a student on long-term placements for vocational training or work experience should be considered and appropriately risk assessed.

3.15.2 Where students on work placements are supervised by someone who is themselves unsupervised, the campus must obtain an enhanced DBS check for that supervisor before the placement begins.

3.15.3 Where the student is under 16 years of age, the campus must also obtain a barred list check for that supervisor. Campuses cannot obtain a barred list check where the student is aged 16 or 17.

3.16 Extended School and off-site-arrangements

3.16.1 If other organisations provide services or activities on the site, the campus must check that they have appropriate procedures in place, including compliance with safer recruitment procedures. The school should check the appropriateness of any visitor to the school (e.g. by internet searches). (refer to the Security & Visitors Policy)

3.16.2 When students attend off-site activities, including day and residential visits and work-related activities, the campus will check that effective child protection arrangements are in place.

3.17 Dealing with Suspected Abuse

3.17.1 All staff should refer concerns to the Designated Safeguarding Lead in the first instance. Refer to the Flowchart for Raising Safeguarding Concerns about a Child. It offers clarity on steps in the process and expectations of what to expect from Children's Social Care. The Flowchart (Appendix 17) should be used where there is a concern about a child - this includes allegations against adults who work with children.

3.17.2 However, if the allegation concerns the Designated Safeguarding Lead, then the Deputy Safeguarding Lead would deal with the incident in the first instance and the Safeguarding Trustee would be involved if the Head Teacher, Designated Safeguarding Lead or Deputy are implicated.

3.17.3 In the meantime, anyone a child discloses a child protection concern to should:

- listen to the student, keeping calm and offering reassurance
- observe bruises but should not ask a child to remove or adjust their clothing to observe them
- allow the child to lead the discussion if a disclosure is made, but do not press for details by asking questions, e.g. "what did they do next?"
- do not ask a leading question (i.e. one that suggests the answer that is expected)
- listen — don't investigate or ask leading questions, but use questions such as "is there anything else you'd like to tell me?"
- accept what the student says without challenge — reassure them that they are doing the right thing and that you recognise how hard it is for them
- not lay blame or criticise either the child or the perpetrator
- not promise confidentiality — explain that they have done the right thing and who needs to be told
- record the information as soon as possible afterwards using the child's own words as far as possible.

3.18 Allegations of abuse made against teachers and other staff

3.18.1 A student may make an allegation against a member of staff, volunteer or Head Teacher. If such an allegation is made, the following procedure should be followed.

3.18.2 **The Local Authority Designated Officer (LADO) should be informed** immediately of any disclosure about a staff member or adult working with the school in any capacity. It is not the role of the Head Teacher, Trustee or DSL to decide whether an allegation should be referred to the LADO. The LADO should be made aware straight away and will work with the school to manage next steps. If a criminal offence has been committed, the police and the LADO should be contacted.

Handling and Managing Allegations of abuse against teachers and other staff

3.18.3 The following guidance is in Section 4, Keeping Children Safe in Education (2016):

- This section gives detailed guidance to campuses about:
 - duties of an employer and employee
 - initial considerations
 - supporting those involved
 - confidentially
 - managing the situation and exit arrangements
 - record keeping
 - references
 - timescales
 - oversight and monitoring
 - suspension
 - information sharing
 - specific action to be taken with regard to malicious or unsubstantiated allegations and conclusions
 - learning lessons

3.18.4 It is important that those responsible for staff are aware of this information, know what to do should an allegation be made and know where to find any further advice and details they need.

3.18.5 A member of staff/volunteer against whom a serious allegation has been made will not automatically be suspended. Suspension will arise on the following grounds:

- a child or children would be at risk
- the allegation is so serious that dismissal for gross misconduct is possible
- it is necessary to allow any investigation to continue unimpeded.

3.18.6 Suspension may be considered at any stage of an investigation, but is a neutral act, not a disciplinary sanction, and will be on full pay. Confidential records must be kept.

3.18.7 A false allegation, whether it is made for frivolous or malicious reasons, can jeopardise the career of a member of staff/volunteer and cause irreparable damage. Equally, if a genuine complaint is not taken seriously, it can be damaging to the child concerned and to other children who may become future victims. The matter must remain strictly confidential until the Designated Safeguarding Lead in conjunction with the Local Authority has made an initial assessment and decided what steps are to be taken. A decision will be taken as to whether the suspicion or allegation is an internal disciplinary matter (in which case the campus's disciplinary procedures will be followed) or whether there is a potential child protection issue, in which case the campus's child protection procedures will be followed in line with the Local Safeguarding Children Board's procedure

3.19 Low level concerns about adults in school

3.19.1 Low level concerns, that may not reach the threshold for reporting, should be referred to the Head Teacher.

- 3.19.2 Such 'low-level' reporting will enable patterns of inappropriate behaviour to be detected as early as possible and for appropriate and proportionate action to be taken swiftly in response.
- 3.19.3 Focus School Gloucester Campus require staff to self-report breaches of the staff code of conduct. In order for any such mechanism to be effective, it is very important that it is implemented in a way that ensures buy in from staff and does not create a suspicious or toxic atmosphere, which could be highly damaging to the school's organisational culture. Key to this are:
- 3.19.4 Building and maintaining a powerful organisational culture through training, vigilance, purpose and openness.
- 3.19.5 Staff training and communication that is carefully designed and delivered to include low-level concerns.
- 3.19.6 Where a concern does not meet the LADO's threshold, the school should take appropriate and proportionate action. This may include:
- 3.19.7 Investigating the matter and clearly explaining to the adult who is the subject of the concern (a) why their behaviour is inappropriate; (b) exactly what they should do going forwards to ensure that they correct their behaviour; (c) the consequences if they don't (e.g. disciplinary action/referrals to LADO); and (d) closely monitoring the situation to ensure that the member of staff is in fact correcting their behaviour.
- 3.19.8 For some concerns (for example, where the staff member has breached the staff code of conduct or school policies), following the school's disciplinary procedure, a record of the procedure followed and action taken should be placed on the staff's confidential and secure personnel file **so that any concerning patterns of behaviour can be spotted.**

3.20 Visitors to school

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

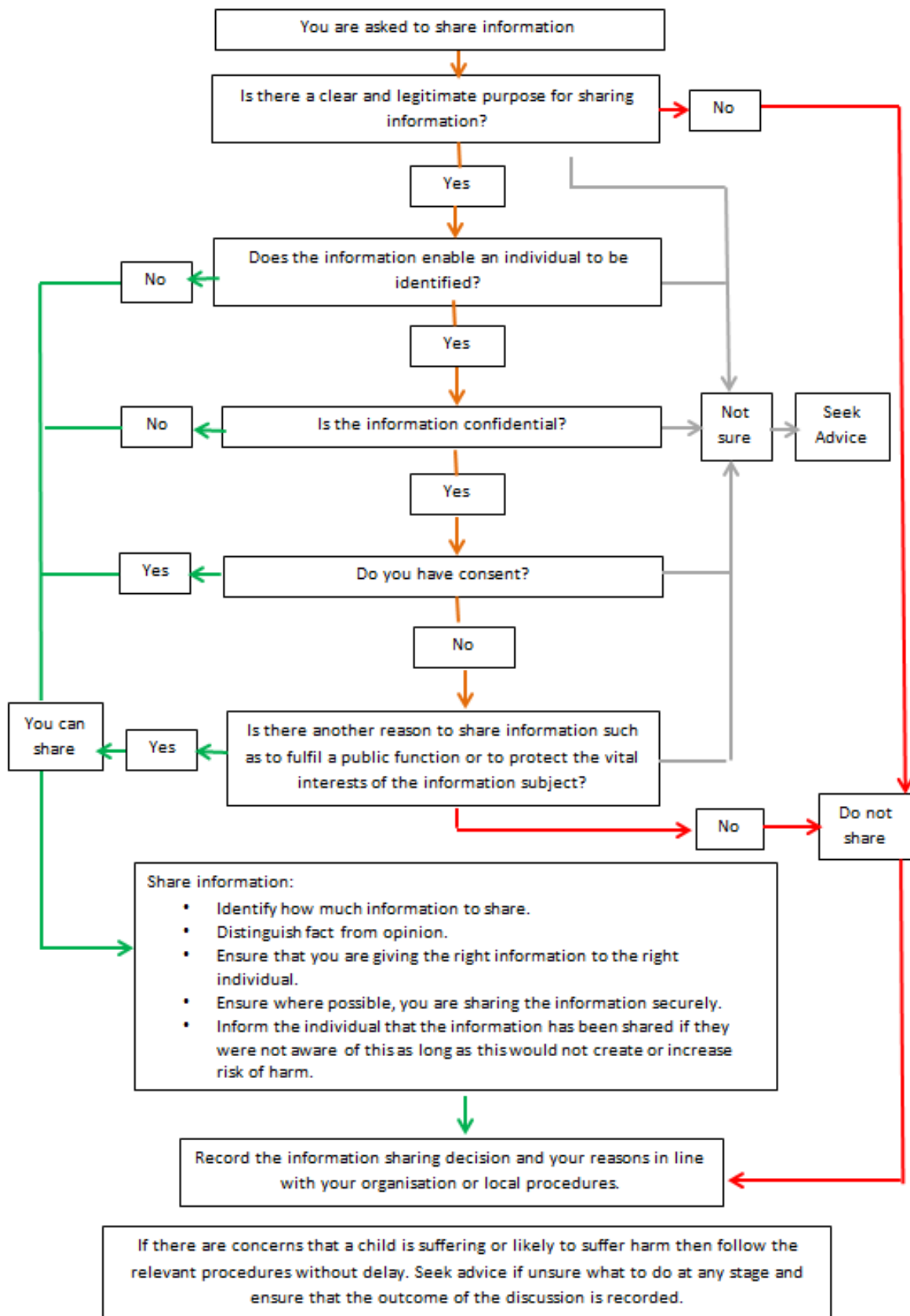
3.21 Information sharing

- 3.21.1 **Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect.**
- 3.21.2 The decisions about how much information to share, with whom and when will ensure that an individual receives the right services at the right time. At the other end of the spectrum it could be the difference between life and death. Poor or non-existent information sharing is a factor repeatedly flagged up as an issue in Serious Case Reviews carried out following the death of, or serious injury to, a child. **No staff member will assume that someone else will pass on information which may be critical to keeping a child safe. A DSL will always confirm referral of a concern. If not, ask again.**
- 3.21.3 Professor Munro's review of child protection concluded the need to move towards a child protection system with less central prescription and interference, where we place greater trust in, and responsibility on, skilled practitioners at the frontline. Those skilled practitioners are in the best position to **use their professional judgement about when to share information with colleagues working within the same organisation**, as well as with those working within other organisations, in order to provide effective early help and to keep children safe from harm.
- 3.21.4 Following a referral, the decisions about how much information to share, with whom and when will be made. The DSL will always weigh up what might happen if the information is

shared against the consequences of not sharing the information. Early sharing of information is key to providing effective early help where there are emerging problems. At the other end of the continuum, sharing information can be essential to put in place effective child protection services from a range of stakeholders.

- 3.21.5** Whilst the Data Protection Act 1998 places duties on organisations and individuals to process personal information fairly and lawfully, **it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm.** Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns.
- 3.21.6 Decisions about information sharing should be recorded in the Child Protection Chronology sheet.**
- 3.21.7** For more information on sharing information which includes a myth-busting guide see **Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (March 2015).**
- 3.21.8** The following flowchart provides a guide to decisions about sharing of information

Flowchart of when and how to share information



3.22 Children Absconding or going missing from an educational setting

DfE Guidance Children Missing Education September 2016

- 3.22.1** Should a child abscond or go missing it is a potential for abuse and neglect and the campus has a procedure in place detailed in the Attendance Policy to ensure the safeguarding of a child going missing, particularly on repeat occasions. The Head Teacher will log incidents, contact parents and / or other agencies as appropriate and in line with the Attendance Policy. This may be delegated to the DSL.
- 3.22.2** **The Campus will inform the LA if a child is missing for 10 days or more without permission.**
- 3.22.3** Additional information is available in Annex A of the Keeping Children Safe in Education and DfE Guidance Children Missing Education September, 2016 confirms the process for reporting to the LA as follows:

- **Removal of a Student from Roll**

- The Campus will notify the local authority for the child's locality when they are about to remove a student's name from the campus admission register under any of the fifteen grounds listed in this guidance as Annex A. Full details of the student will be provided to the LA when removing a student from roll and all reasonable enquiries will be made to establish the whereabouts of the child jointly with the LA.

- **Adding a student to Roll**

- The LA for the child's locality will be informed within 5 days when adding a student to the admission roll at a non-standard transition point. Full details of the student will be provided to the LA.
- A non-standard transfer **includes transfer in to our school at year 3**, as this is not a usual transition point in mainstream education.
- This Guidance will also form part of the Admissions Policy. See below for LA contacts for a change in the admission register:

Gloucestershire Local Authority: missingpupils@gloucestershire.gov.uk
01452 427800

Herefordshire Local Authority: admissions dept. 01432 383168
schooladmissions@herefordshire.gov.uk

Wiltshire Local Authority: refer to Gloucestershire LA who will pass details on.

Worcestershire Local Authority: report following link below – login's are held by PA to Headteacher and Designated Safeguarding Lead.
https://capublic.worcestershire.gov.uk/Chs_Portal/Home.aspx

3.23 Making a Referral

- 3.23.1** When deciding whether to make a referral, following an allegation or suspicion or abuse, the Head Teacher and Designated Safeguarding Lead **should not make their own decision over what appear to be borderline cases**, but rather the doubts and concerns should always be discussed with the designated officer(s) at the local authority.
- 3.23.2** Concerns about children should be made to Children's Social Care, from the area where the child lives. Contact details for local services are on Appendix 10b – Local Arrangements for Safeguarding Children, and are listed below:

Gloucestershire: Contact Children and Families Helpdesk on 01452 426565 (during office hours), but if you are concerned about the immediate safety of a child please contact the Police on 101 at any time. Email to childrenshelpdesk@gloucestershire.gov.uk website link: <http://www.gloucestershire.gov.uk/health-and-social-care/children-young-people-and-families/report-a-child-at-risk/>

Herefordshire: If you think that a child has been harmed or is being neglected, contact the Multi Agency Safeguarding Hub on 01432 260800 or call the Police on 101. Website link: <https://herefordshiresafeguardingboards.org.uk/hscb>

Wiltshire: Multi-Agency Safeguarding Hub (MASH) Team on 0300 456 0108 (out of hours: 0845 6070 888); website link: <http://www.wiltshire.gov.uk/children-young-people>

Worcestershire: Contact the Family Front Door on 01905 822 666 from Monday to Friday 8.30am to 5.00pm (until 4:30pm on a Friday). Out of office hours (5.00pm to 8.30am weekdays and all day weekends and bank holidays) contact the Emergency Duty team on 01905 768020. Website link: http://www.worcestershire.gov.uk/info/20383/are_you_a_professional_worried_about_a_child

3.23.3 Any concerns about staff members should be referred to the Local Authority Designated Officer from the area the campus is based. Details are held on Appendix 10b, and are below:

3.23.4 Gloucestershire LADO Service, contact number and website.

The designated officer at Gloucestershire Local Authority is Jane Bee. 01452 426994. jane.bee@gloucestershire.gov.uk www.gscb.org.uk

3.23.5 The initial sharing of information may lead to:

- a decision not to take any further action
- a strategy discussion
- the involvement of the police or social care services

3.23.6 This may be done tentatively and without giving names in the first instance. What appears minor at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. **Thus the campus should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse.**

3.23.7 All referrals should have an impact and the campus must encourage any follow up. Where this is not the case, the campus should press the agency for re-consideration to ensure concerns are addressed and that the child's situation improves.

3.23.8 Working Together to Safeguard Children – A guide to inter-agency working to safeguard and promote the welfare of children – March 2015 (Appendix 7) and Keeping Children Safe in Education – September 2016 (Appendix 8) apply.

3.23.9 The Designated Safeguarding Lead will:

- follow-up the referral using the Incident Report Form (Appendix 1) within 24 hours.
- make additional records of discussions and any investigation that takes place

- make a decision whether to continue to monitor the situation.
- any decision should be communicated to the individual making the initial referral.

3.24 Whistleblowing

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

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

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

3.25 Dealing with the Media

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

3.25.2 The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

3.25.3 The legislation imposing restrictions makes clear that publication of material leading to the identification of the teacher who is the subject of the allegations is prohibited.

3.25.4 In most cases the Designated Officer(s) at the local authority, Police and Children's Social Care Services will have agreed:

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

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

3.26 Procedures for Monitoring, Recording and Reporting

3.26.1 Detailed, succinct notes should be kept at the time of the incident or immediately after with the subsequent completion of an Incident Report Form (Appendix 1). Records may be used in legal proceedings and must be kept accurate, confidential and secure. The Incident Report Form is given to the Designated Safeguarding Lead and should include factual information rather than assumption or interpretation. The child's own language should be used to quote rather than a translation. All concerns, discussions and

decisions made and the reasons for those decisions should be recorded in writing. If there is any doubt about recording, advice should be sought from the DSL.

3.26.2 Records may be used at a later date to support a referral to an external agency. A Child Protection File should be started where:

- concerns have been raised about the welfare or well-being of a student
- a student makes a disclosure
- information is passed to the campus by the student's previous school.

The Child Protection File

3.26.3 This must be separate from the student's general school records but a mark should be made on the general school record (i.e. coloured sticker) to indicate that there is a Child Protection File.

3.26.4 Ensure that the Child Protection Files are kept confidential, safe and secure on the campus site by the Designated Safeguarding Lead with a summary front sheet.

3.26.5 Ensure all forms, referrals, reports, notes, correspondence etc., relating to the student are retained in one file (Appendix 1)

3.26.6 Siblings – ensure files are cross-referenced but be cautious about what information about the other sibling is included

3.26.7 Access to the information on the file should be on a 'need to know' basis amongst staff

Transferring Files

3.26.8 The DSL is responsible for ensuring that the Child Protection Files are transferred to each school that a child moves to (e.g. primary to secondary) and the transfer must be conducted securely. It is good practice to put a front sheet on a manual case file that lists the contents and request a receipt from the accepting school. Safeguarding leads are asked to carefully consider what is transferred and your LSCB may have specific protocol about file transfer. If a child has siblings that are staying in the same campus it is important to keep a copy of that child's file.

3.26.9 The Designated Safeguarding Lead must:

- ensure transfer of Child Protection Files to the new school without delay; within 5 days. Ask for confirmation of receipt from the receiving school
- send separately from the student's general school file
- keep a copy of the file until they have confirmation that the new school has received it and then destroy the copy unless siblings remain at the campus. Maintain a list of records that have been destroyed and who authorised their destruction.

Record Keeping

3.26.10 Child Protection records should be retained by the last school attended. The long term security of relevant safeguarding documents and related correspondence is crucial should allegations of abuse arise. All such documents must be securely retained for a minimum of 50 years.

3.26.11 Documents containing personal data as defined in the Data Protection Act 1998 should be retained 'for as long as necessary' – from an insurance point of view for no less than 50 years to ensure that documents are available in the event of an allegation of abuse arising.

3.26.12 Additionally, storage provisions for all such documents must be arranged in the event of the School / Education Trust ceasing operations. Storage in these

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

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

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

Data Sharing

3.26.14 Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Information sharing with other agencies is vital in identifying and tackling all forms of abuse. (see appendix 17 – Managing a concern about a child or young person)

3.26.15 Where children are on the child protection register and leave one school for another, the Designated Safeguarding Lead must inform the receiving school. If the child leaves the school with no receiving school, details should be passed to the local authority principal education social worker.

3.26.16 Staff have a professional responsibility to share relevant information about the protection of children with the investigative agencies. Members of staff should not promise confidentiality but can let the child know that only those who need to know will be informed and always for the child's own sake.

3.26.17 Time should be taken to reassure the child and confirm that information given will be treated sensitively. Reassurance should be given and the adult involved must listen sympathetically and non-judgmentally.

3.26.18 Staff should be careful in subsequent discussions and ensure that information is only given to the appropriate person. All staff should be kept aware of issues relating to confidentiality and the status of information they may hold.

3.26.19 Members of staff, other than the designated member and those involved closely, should only have enough details in order to help them to act sensitively and appropriately to a student. Sensitive information regarding pastoral issues and for children on the child protection register must be kept confidential and secure. Discretion should be used when talking about the personal and changing circumstances of children, e.g. when a child goes into care.

3.27 Supporting Children at Risk

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

3.28 Early Help

- 3.28.1 The campus will be prepared to identify children who may benefit from early help. This means **providing support as soon as a problem emerges at any point in a child's life**.
- 3.28.2 All staff should understand their role in early help and support the assessment process. Staff are encouraged to discuss any early help requirements with the DSL.
- 3.28.3 The DSL will liaise with parents early on to ensure that early help will be effective. If the child or parents refuse consent to an early help assessment then further advice will be taken from the LSCB.
- 3.28.4 There may be a requirement to support other agencies and professionals in an early help assessment.
- 3.28.5 If early help is appropriate, the DSL should support liaison with other agencies and setting up an inter-agency assessment if appropriate. The case should be kept under constant review and consideration given to a referral to Children's Social Care if the situation doesn't appear to be improving.
- 3.28.6 The distinction between children who would benefit from early help and those whose needs may meet the threshold for statutory intervention under the Children Act 1989 should be decided in liaison with Children's Social Care. Those considered to be 'in need', for the purposes of the Act, are **those who may be suffering, or likely to suffer, significant harm or those who may be in immediate danger and in need of immediate protection** - where referrals to Children's Social Care should be made immediately.

3.29 Learning Support

- 3.29.1 In supporting Children at Risk it is recognised that an additional barrier can exist when recognising abuse and neglect of children with Special Educational Needs and Disabilities.
- 3.29.2 This can include:
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
 - Children with SEN and disability can be disproportionately impacted by things like bullying without outwardly showing any signs
 - Communication barriers and difficulties in overcoming these barriers

3.30 The Personal Education Plan

- 3.30.1 Children who are 'looked after' will have their own personal education plan (PEP). The PEP is part of the care plan. It is a record of what needs to happen in order to enable the child to "fulfil their potential". It should reflect other education plans such as individual education plans, behaviour plans etc.

3.31 Support in Campus

- 3.31.1 All class teachers and year group leaders are responsible, in conjunction with other campus staff, for the pastoral needs of the children in their care. This includes maintaining opportunity for children to share their concerns and follow the guidance in this document. Care should always be taken in regard to the discussion of sensitive issues and advice should be sought from a DSL where there are concerns.
- 3.31.2 Within the curriculum there will also be opportunities to discuss issues which some children might find sensitive. Care should be taken particularly in relation to discussion about families and their make-up. Assumptions about members of families and the

presence of both parents should be avoided both in discussion and the presentation of materials. Staff should make themselves familiar with the background of the children in their care in order to avoid distress.

3.32 Physical Contact with Students

- 3.32.1** Some form of physical contact with students by teachers is inevitable. All teachers should be aware of issues related to touching and the way in which this might be misconstrued. This relates particularly to any sensitive areas of the body.
- 3.32.2** Where any uncertainty exists, a senior member of staff should be consulted.
- 3.32.3** At all times, one-to-one discussions with students should most appropriately take place in rooms which are openly visible to other members of staff.
- 3.32.4** In the event of physical restraint, it is important that only the minimum amount is used in order to prevent the student from causing injury to themselves, others or property. Following such an intervention the Incident Report Form (Appendix 1) should be completed.
- 3.32.5** Staff in campus, when appropriate, will have training in restraint; it is only those members of staff who have been appropriately trained who will administer restraint methods. Further guidance on Power to Restrain is covered in the Behaviour Management Policy.

3.33 Safer Recruitment – Management Responsibility

- 3.33.1** In line with Part 3 of the Keeping Children Safe in Education, the Board of Trustees will prevent people who pose a risk of harm from working with children by adhering to their statutory responsibilities to check all staff who work with children, taking decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised.
- 3.33.2** The Board of Trustees, as per their legal duty will ensure that the Safeguarding Trustee and / or DSL refer to the Local Authority any allegations made against a teacher, Head Teacher, volunteer or other member of staff and that they also make a referral to the DBS Service if a person in regulated activity has been dismissed or removed due to a safeguarding concern, or would have been had they not resigned. Referral should also be made to the National College of Teaching and Leadership under these circumstances.
- 3.33.3** An HR Trustee will be appointed to oversee HR provision including recruitment and selection.

3.34 Unsuitable to Work with Children Reporting

- 3.34.1** The campus will report to the DBS (Refer to DBS Policy), within 14 days of leaving the campus, any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children in accordance with the legal duty under section 35 of the Safeguarding Vulnerable Groups Act 2006.
- 3.34.2** The campus will report to the National College of Teaching and Leadership (NCTL) within 14 days, any teacher - qualified or unqualified, employed or contracted - whose has breached the teacher's standards or is considered unsuitable to work with children.

3.35 Recruitment Policy and Procedure

Part 3 of Keeping Children Safe in Education

- 3.35.1** Part 3 Safer Recruitment – Clarifies Regulated Activity including supervised and unsupervised access of volunteers. Supervised volunteers are not in Regulated Activity. For those engaged in Regulated Activity (see flowchart in the procedures with regard to Regulated Activity), an Enhanced DBS with Barred List Information will be required.

3.35.2 Pre-Employment Checks must be carried out for all new appointments.

3.35.3 When using agency and third party staff the campus must be obtain evidence from the third party organisation supplying the staff that all Safer Recruitment checks have been carried out.

3.35.4 An offer must be conditional upon satisfactory completion of pre-employment checks including:

- Identity
- Enhanced DBS with Barred List Check – if the applicant or new appointment subscribes to the DBS Up-dating Services you will be able to access this information on line
- *Check applicants called for interview are not subject to a Teacher Prohibition Order or an interim Prohibition Order made by the Secretary of State
- *Section 128 Direction – checks on Trustees to ensure that they are not prohibited or restricted from taking part in the management of an independent school
- Verify mental and physical fitness to carry out the role (Disclosure on the Focus Application Form and completion of the Focus Medical Questionnaire once an offer is made to appoint). An annual declaration will be required thereafter
- Verify the right to Right to Work in the UK; further checks if lived outside the UK
- Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. In addition, schools and colleges must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These further checks should include a check for information about any teacher sanction or restriction that an EEA professional regulating authority has imposed, using the NCTL Teacher Services' system. Although restrictions imposed by another EEA regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment.
- The Home Office has published guidance on criminal record checks for overseas applicants. The department has also issued guidance on the employment of overseas-trained teachers. This gives information on the requirements for overseas-trained teachers from the EEA to teach in England, and the award of qualified teacher status for teachers qualified in Australia, Canada, New Zealand and the United States of America.
- Verify professional qualifications
- Two References prior to successful candidates taking up a post. These references must be verified. If using an agency or other third party, ensure that written notification is obtained that the necessary checks have been carried out – must include DBS Barred List and Identity.

**Teacher Prohibition Order or Interim Prohibition Order checks, and Section 128 checks for Trustees prohibited or restricted from management must be carried out via access to the Employer Access on-line (see access details in the Single Central Record). These checks are only possible for qualified teachers.*

3.35.5 If a campus knows, or has reason to believe, that an individual is barred, it commits an offence if it allows the individual to carry out any form of Regulated Activity.

3.35.6 All checks must be recorded and information placed on the Single Central Record.

3.36 DfE: Childcare Disqualification Requirements – February 2015

3.36.1 This is statutory guidance from the DfE on the application of the Childcare (Disqualification) Regulations 2009 (Appendix 10). It covers disqualification criteria, relevant offences and orders, staff covered, action for schools and disqualification by association.

3.36.2 Following further guidance from the DfE, Focus Schools currently do not meet the requirements for this check.

3.37 Single Central Record

3.37.1 Who should be on the Single Central Record?

- all staff (including supply / agency staff) who work at the campus
- all others who work in regular contact with children in the campus including volunteers, peripatetic staff, minibus drivers, consultants, contractors
- all members of the proprietor body.

3.37.2 What information should be on the Single Central Record?

3.37.3 The SCR must record for each person whether or not the following checks have been carried out or certificates obtained for, and the date on which the checks were completed, including:

- start date
- position held
- identity check
- check of professional qualifications
- prohibition from teaching check
- management prohibition check of trustees
- staff who have previously worked in the EEA Section 128 check and any further checks on people living or working outside the UK as the campus feels appropriate (if relevant)
- enhanced DBS with Barred List check
- evidence that at least two references have been obtained
- post engagement medical fitness check and thereafter an annual medical declaration
- check on right to work in the United Kingdom (if relevant)
- agency / supply staff - campuses must have obtained written notification from agency or third party organisation that these checks have been done; campuses must check the identity of the member of staff from the agency.
- Contractors - campuses must have obtained written notification from the contracting company that all pre-employment checks have been completed and the employee is suitable to work in a school environment; campuses must check the identity of the contractor.

3.37.4 It is the duty of the HR Trustee to ensure that anyone who performs regulated work with students has been subject to the appropriate detailed checks (as per the flowchart on previous page) and that the information is retained on the SCR.

3.37.5 The Single Central Record has a Management Check column. This check must be carried out at least termly by the HR Trustee or delegated person from the Leadership Team, initialled and dated. The check should make sure:

- All information is held, that should be
- All key checks are initialled and dated by the person carrying out the check
- Starters and Leavers have been managed correctly in terms of the SCR
- Files are kept securely

3.38 Duty of campus to DBS

3.38.1 Campuses have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not resigned.

3.38.2 Inspectors will check that the proprietor knows of this duty and knows what to do in the event of such an occurrence.

3.38.3 The campus will operate Safe Recruitment Procedures (Refer to Recruitment, DBS Policies, Single Central Record, and Keeping Children Safe in Education Guidance) and will check all staff, trustees, volunteers and others who work in campus to ensure their suitability to work with children.

3.38.4 The Recruitment Procedures for staff employed by the campus and from agencies will meet Part 4 regulatory requirements of the Independent School Standards Regulations 2014, by ensuring the Single Central Record is compliant. Checks on staff and volunteers are carried out with regard to previous employment history, character and professional references. Checks will be made in line with national guidance.

3.38.5 **The trustees will adopt the Safe Recruitment and Selection Procedures that help to deter, reject or identify people who might abuse children or are unsuitable to work with them.**

3.38.6 **The main elements of the recruitment process will include:**

- ensuring that the job description makes reference to the responsibility for safeguarding and promoting the welfare of children
- ensuring that the person specification includes specific reference to suitability to work with children
- obtaining and scrutinising comprehensive information from applicants and taking up and satisfactorily resolving any discrepancies or anomalies
- obtaining independent professional and character references that answer specific questions to help assess an applicant's suitability to work with children and follow up any concerns
- a face to face interview that explores the candidate's suitability to work with children as well as their suitability for the post
- conducting other checks as detailed in the Recruitment Policy and in the Independent School Standards Regulations 2014 concerning verifying the successful applicant's identity, academic and vocational qualifications, previous employment history and experience, medical fitness and criminal records to ensure that they have not been barred from working with children.

Checking of volunteers and supply staff including those employed from agencies

3.38.7 The Protection of Freedoms Act 2012 has removed the requirement to routinely carry out DBS checks on all volunteers, even where they regularly work with children. Instead, the Act introduces the concept of supervision of volunteers. Where a campus is satisfied that it can provide an adequate level of supervision by a suitably checked person, that is, someone who is defined as working in regulated activity, it is not required to request any DBS checks on the volunteer and is not entitled to request a barred list check. The campus is entitled to request a standard or enhanced DBS disclosure certificate without the barred list check. The entitlement to request a barred list check for volunteers working regularly with children will apply only to those working unsupervised.

Supply staff including those employed from agencies

3.38.8 For supply staff appointed by the campus, all of the regular regulatory checks will be conducted to ensure their suitability to work with children.

3.38.9 For staff appointed from an agency, the agency must provide written notification that all of the regular regulatory checks have been carried out including identity, qualifications, DBS in UK and overseas, right to work in the UK as regulated. Before the supply staff work in campus their identity must be checked.

3.38.10 The campus will, under contractual arrangements request a copy of the DBS certificate that contains any disclosures and trustees will decide if the candidate is suitable.

3.38.11 The Safer Recruitment process will be followed including all relevant checks to be carried out by the campus when supply staff go on to be employed by the campus.

3.38.12 Volunteer and supply staff checks will be in line with the Recruitment Policy and Handbook.

Starting work before DBS and Overseas checks have been obtained

3.39 Staff should not start until their DBS check and any overseas checks have been obtained.

3.39.1 Exceptions to the above may need to be made very occasionally. In these cases, a risk assessment will be carried out to determine (a) whether it is safe for that individual to start work before his or her check has been verified; and (b) the level of supervision required. The individual will not be allowed to attend trips or to be alone with a pupil until their checks have come through. A record of the risk assessment and supervision deemed necessary will always be made in the notes section of the register.

3.39.2 If a DBS check reveals a conviction a risk assessment should be carried out. The School will consult the DBS website for the factors it suggests should be taken into account in carrying out risk assessment.

3.40 Site Security

3.40.1 The Campus Security & Visitor Policy and procedures will be followed. Visitors to the Campus, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site.

3.40.2 All visitors are expected to observe the campus's safeguarding and health and safety requirements to ensure children in campus are kept safe.

3.40.3 The Head Teacher will exercise professional judgement in determining whether any visitor should be escorted or supervised whilst on site.

3.40.4 The school will comply with the CCTV Policy in line with the Data Protection Act and supporting policy.

3.41 E-Safety

ICT & E-Safety Policy

- 3.41.1** The ICT and E-Safety Policy and Procedures policy will be implemented in school. It details roles and responsibilities of the whole school community.
- 3.41.2** Filters and Monitoring is covered off in the ICT and E-Safety Policy. Campuses should ensure that filters and monitoring systems are in place and the process for monitoring systems and dealing with a breach are in line with the procedures and Incident Reporting in the ICT and E-Safety Policy.

Acceptable Use Agreements

- 3.41.3** Safe Use of Images Consent Forms will be completed for all students, staff, trustees, volunteers and visitors. This group will be asked to sign Acceptable Use Agreements and Safe Use of Images Consent Forms in line with the ICT and E-Safety Policy and Safe Use of Images Policy.

3.41.4 E-Safety Reporting Button

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

Mobile Telephones and personal electronic devices (Refer to IT and E-Safety Policy)

- 3.41.6** Our students increasingly use mobile telephones and computers on a daily basis. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and e-mails, to enticing children to engage in harmful conversations. The following policies and procedures support the Child Protection Policy in keeping our students safe in campus:

- ICT and E-Safety Policy and Procedures
- Anti-Bullying Policy including Cyber-bullying
- Behaviour Management Policy
- Staff will also receive advice regarding the use of social networking and electronic communication with students.

Images and Photography

- 3.41.7** The Campus IT and E-Safety Policy and procedures will be followed; to protect students in summary the campus will:
- seek consent for photographs to be taken or published from the student and parent
 - use only the student's first name with an image
 - ensure that students are appropriately dressed
 - encourage students to tell if they are worried about any photographs that are being taken of them.

Social Media

- 3.41.8** Staff are expected to comply with the Trust's IT and E-Safety Policy, which includes having no contact with students or parents via social media websites, text or personal mobile phones.

Video Conferencing and Off-Site Arrangements

- 3.41.9** Where students are in Video Conference or other conference links with staff from other Focus Campuses there will be written assurance from the teacher's employing campus

that all vetting checks, including DBS, have been carried out and these staff will be added to the SCR.

3.41.10 The Focus National Support Office retains a database of Designated Safeguarding Leads in each Focus campus should there be a need to share information in the event of a disclosure.

3.42 Extremism and Radicalisation (The Prevent Duty)

3.42.1 Focus Learning Trust has a statutory duty under The Counter-Terrorism and Security Act 2015 and the statutory Prevent Guidance 2015 to have due regard to the need to prevent people from being drawn into terrorism in all its schools.

3.42.2 Extremism is defined as vocal or active opposition to fundamental values of our society, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation is defined as the act or process of encouraging extremist views or actions in others, including forms of extremism leading to terrorism.

3.42.3 Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should immediately refer and discuss this with the Designated Safeguarding Lead. The Designated Safeguarding Lead will refer on to the Police (Channel) or Children's Social Care as necessary.

3.42.4 The Designated Safeguarding Lead must receive training about the Prevent Duty and tackling extremism and must be able to support staff with any concerns they may have. This training should be organised via the Local Authority the school is based [Gloucestershire] (for example, WRAP training). The Home Office elearning programme can be accessed whilst staff are waiting for WRAP training <https://www.elearning.prevent.homeoffice.gov.uk/>

3.42.5 We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

3.42.6 We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

3.42.7 Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across on-line so involvement with particular groups may not be apparent.)
- secretive behaviour
- on-line searches or sharing extremist messages or social profiles

- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

3.43 Complaints

3.43.1 The Complaints Policy and Procedures will be followed where a student or parent raises concerns about poor practice towards a student that initially does not reach the threshold for a child protection action, however cannot be resolved following guidance in the Behaviour Management and Anti-Bullying Policies and Procedures.

3.43.2 Complaints from staff are dealt with under the campus complaints and disciplinary and grievance procedures.

3.44 Charity Commission

3.44.1 Reference should be made to the Financial Procedures Handbook and the Charity Commission guidance when considering Serious Incident Reporting

3.45 Schools Inspection Service (SIS)

3.45.1 The Schools Inspection Service, as the regulatory inspector, should be informed of all serious incidents, in writing to the Chief Inspector.

3.46 Inspections

3.46.1 What Inspectors will expect to see (See also Appendix 2 Audit Checklist)

3.46.2 It is acknowledged that at inspection the arrangements for safeguarding children and learners will be reported on in line with the inspection framework (Section 70 School Inspection Service) and Keeping Children Safe in Education guidance (2016).

3.46.3 Schools will need to ensure that all statutory responsibilities are met with regard to safeguarding including:

- Single Central Record –no gaps
- Safe, thorough and well organised Child Protection records; kept confidentially
- evidence that a robust Safer Recruitment process is in place
- student attendance – rigorous follow-up
- at risk students are clearly identified
- decision making process about taking students off-roll – covered in the attendance procedures
- actions following any serious incident
- actions taken to safeguard students in off-site or alternative provisions including Video Conferencing
- actions taken to identify students and steps taken to reduce risk of radicalisation and extremism
- steps taken to promote E-safety and safe practices including Acceptable Use Agreements and Filters and Monitoring
- referrals to the Designated Officer at the Local Authority and the follow up (if any)

- success in keeping children safe, for example effective Risk Assessments and actions taken following serious incidents
- testing out awareness of the Policy and its Procedures – that staff and volunteers know who is responsible for Safeguarding, that the training received has had an impact and that staff know what they should be doing
- sight of the Safeguarding Training Log and that it is current and up to date including on-going up-dates to skills and knowledge
- evidence that staff have received and read the Child Protection Policy and its procedures including Keeping Children Safe in Education Guidance.

3.46.4 Consider the following questions, and how they would be evidenced:

- Does the campus have a culture of vigilance?
- Is the welfare of students promoted?
- Do timely actions arise from safeguarding concerns?
- Is there a strong, robust and proactive response to reduce the risk of harm?
- Are staff carefully selected and vetted?
- Are staff aware of the safeguarding procedures?
- Do all staff understand the risk of the internet and social media?
- Do staff work together to create a safe, physical environment in the campus?
- Do students feel safe?
- Are they helped to protect themselves from a range of risks?
- Are students able to identify a trusted adult to listen to their concerns?
- Is the statutory requirement for training of those with a responsibility for safeguarding met?
- Are staff trained in the use of internet and social media and types of abuse and neglect?

4.0 RESPONSIBILITIES

Post(s)	Responsibilities	Ref
Chair of the Board	<ul style="list-style-type: none"> • ensure that all trustees have a current, clear Enhanced DBS Certificate • That the Section 128 Check is carried out on all members of the Board. 	
Safeguarding Trustee	<ul style="list-style-type: none"> • be responsible for undertaking annual reviews and evaluation at Focus School Gloucester Campus of the Safeguarding & Child Protection Policy and procedures in conjunction with the Designated Safeguarding Lead. • ensure that the Safeguarding Audit is carried out at least termly and that all action points 	

	<p>are remedied without delay. (Evaluation and Checklists as Appendix 2)</p> <ul style="list-style-type: none"> • meet regularly with the Designated Safeguarding Lead (DSL) / and / or Deputy to discuss updates, reviews and evaluation of the Child Protection policies and procedures • ensure that safeguarding arrangements take into account policies and procedures of the Local Safeguarding children Board (LSCB). • have procedures in place to handle allegations against other children (peer on peer) • have procedures in place to handle incidences of youth produced sexual imagery • have procedures in place to handle allegations about staff members, volunteers or visitors to the school, including allegations against the Head Teacher and Trustees • ensure the campus's Safeguarding and Child Protection Policy is available publicly and on the campus website • be trained in child protection and inter-agency working. This training will be updated every two years or in line with the LSCB requirements. • be trained in inter-agency working (up dated every two years or in line with the LSCB requirements) ensuring an overview of Safeguarding, Child Protection and an understanding of how the associated agencies work • ensure that appropriate child protection training is in place (current and up-to-date) for the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead to a standard set by the Local Safeguarding Children's Board and is recorded on the Training Log (Appendix 4) • ensure that the Designated Safeguarding Lead and Deputy have sufficient time, funding, training, support and resources to undertake their role and to support other staff within the campus • ensure that new staff members taking on a Designated Safeguarding role are appropriately trained by the LSCB and that they are booked on the next available LSCB training once appointed, before taking up the post • ensure that appropriate child protection training is in place as part of the induction for all staff including temporary and voluntary staff and that it is updated annually or in line with the LSCB requirements (Appendix 4) 	
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	<p>and that there is no lapse in training dates. Safeguarding training must always include an element of face to face, interactive training.</p> <ul style="list-style-type: none"> • liaise with the Local Authority on child protection or allegations of abuse against staff, including the Head Teacher or DSL • if appropriate, ensure that the DSL receives training to promote the educational achievement of children who are looked after. 	
HR Trustee	<ul style="list-style-type: none"> • What they are supposed to do • ensure that the statutory responsibilities for recruitment and the Recruitment Policy and Procedures are followed; preventing people who pose a risk of harm from working with children • ensure Safer Recruitment Procedures are followed, including pre-employment checks and vetting of new staff and volunteers working with children and records kept in line with the Keeping Children Safe in Education Guidance (2016) and the supplementary guidance on Disqualification Requirements. • ensure that at least one person on a recruitment panel has undertaken safe recruitment training • ensure that the Recruitment Procedures meet all of Part 3 of the regulatory requirements and a Single Central Register is duly compliant and up-to-date at all times including the new EEA checks if a person has lived or worked outside of the UK (The Single Central Record should have as a minimum a termly management check) • ensure that all appropriate child protection checks and procedures are applied to staff employed by another organisation such as agency staff working with the campus's students, and that they are carried out • ensure that no barred person is allowed to work in any regulated activity • have procedures to fulfil the legal duty to make a referral to the DBS in the event of dismissal of staff on safeguarding grounds • ensure that assurance is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the campus's students on another site (refer to the Camera and Using Images Policy for Video Conference and FLN). 	
Designated Safeguarding Lead (DSL)	<ul style="list-style-type: none"> • liaise with the Safeguarding Trustee with regard to implementation of the Child Protection Policy and Procedures and that they are reviewed and evaluated annually 	

	<ul style="list-style-type: none"> • be trained in child protection and inter-agency working including The Prevent awareness training, institutional grooming and E-Safety training. This training will be updated every two years or in line with the LSCB requirements • ensure knowledge and skills are kept up-to-date • retain clear and well-organised written records of all concerns, discussions and decisions and the reason for those decisions • keep records confidentially and review regularly so that concerning patterns of behaviour can be spotted. • Ensure the Safeguarding Local Arrangements form (appendix 10b) is up to date and displayed in Reception and all staff working areas in school. • Ensure the Safeguarding Display poster (appendix 10c) is up to date and displayed in reception and key student areas in school. • understand the assessment process for providing early help and intervention and contribute to this process • provide a working knowledge of how the Local Authority (LA) conducts a Child Protection case conference and a Child Protection planning meeting and review conference enabling effective contribution to a case if and when required • be alert to the specific needs of children in need, those with special educational needs and young carers • be the first point of reference for staff regarding safeguarding concerns • act as a source of advice and support within the campus, be aware of new issues and latest guidance on Safeguarding • ensure that staff are familiar with the campus policy and procedure, raise awareness of CP issues among staff and encourage a culture of listening to children and taking account of their wishes and feelings • organise training on child protection, E-Safety and Prevent within campus for all staff, volunteers and trustees ensuring that it is current and up-to-date and is recorded on the Training Log • keep all staff up-to-date with knowledge and skills • if required, complete the LSCB Annual Audit for Child Protection / Safeguarding • co-ordinate action within the campus, decide whether to refer a concern to social care and 	
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	<p>other agencies over cases of abuse and suspected abuse or to monitor the situation including supporting staff who make a direct referral to social care or the Channel programme</p> <ul style="list-style-type: none"> • make child protection referrals, recording and reporting accordingly and monitoring regularly (including to the Channel programme where there is a radicalisation concern) • liaise closely with agencies and services such as LA children’s social care, Local Authority Designated Officer(s) (LADO), case manager at the LA, DBS and / or police (as relevant) about individual cases • ensure there are appropriate strategies for accurately recording and reporting all concerns / incidents and that they are kept securely within campus, separately from the main student file. • ensure that when a child leaves a campus and they have a Child Protection File that it is transferred to the new school, separately from the main student file, ensuring secure transit and confirmation of receipt • provide appropriate feedback to members of staff as and when necessary • arrange counselling for members of staff as appropriate • have appropriate knowledge and training to protect and promote the welfare of a looked after child; holding details of looked after children and their contact information • liaise with the Safeguarding Trustee where a person is dismissed or left due to risk / harm to a child and that the case is referred to the Disclosure and Barring Service or if a crime has been committed, referred to the police. Referral should also be made to the National College of Teaching and Leadership. 	
<p>Headteacher</p>	<ul style="list-style-type: none"> • undertake the LSCB Training, if they are not the DSL or Deputy DSL • ensure that Safeguarding, including helping to protect students from a range of risks including on-line is fully explored in teaching and learning opportunities within the curriculum • ensure that students are able to identify a trusted adult to listen to their concerns • ensure that there is a Safeguarding Notice Board in the Staff Room demonstrating how the campus keeps children safe, to include e-safety (ref: IT and E-Safety Policy). It will include how to report a concern, training dates, policies, posters, roles and 	

	<p>responsibilities of safeguarding personnel, safeguarding up-dates, Keeping Children Safe in Education Guidance and other publications and communications with regard to safeguarding</p> <ul style="list-style-type: none"> • ensure Safeguarding Notices are displayed around the school; at reception and in all communal areas (Appendix 10) • meet with the Designated Safeguarding Lead to be kept informed of on-going investigations • be the appointed member of staff to promote the achievement of looked after children • be alert to children who go missing and put in place the appropriate safeguarding response 	
Campus Staff	<ul style="list-style-type: none"> • know who holds the Designated Safeguarding Lead and Deputy roles within the campus • receive annual training in child protection (This training also applies to the Head Teacher if he or she is not the Designated Safeguarding Lead). 	
Focus Learning Trust National Safeguarding Lead	<ul style="list-style-type: none"> • To provide guidance to all campuses on Policy and Procedure related to Safeguarding. • To provide advice and guidance to Head Teachers and Safeguarding Trustees in the implementation of the Child Protection Policy, Procedures and for training of staff, parents, volunteers and students. • To support external reviews of the effectiveness of Safeguarding and Child Protection at a Campus. This includes providing audit tools and procedures. • To provide professional support to the Head Teacher and Trustees in the management of complex or critical incidents, once referred to the appropriate authorities. • This does not replace, and is separate from the advice provided by the LSCB, LADO and Children’s Services in the event of a disclosure. 	
Regional Principal	<ul style="list-style-type: none"> • Delegated professional line management of the Head Teacher. • To verify that the Child Protection Policy and Procedures are fully implemented at the campus and to report on its effectiveness to the Board of Trustees. • To advise on improvements to the implementation of the Child Protection Policy at a campus. For example, on the impact of staff training or record keeping. • To be aware, as delegated line manager, of Safeguarding referrals having been made, including allegations against staff members. 	

	<p>Specific details of referrals relating to children do not need to be shared.</p> <ul style="list-style-type: none"> • To provide professional support in the event of disciplinary procedures against students or adults in school. • This should not, IN ANY WAY, replace advice from the LADO, Children’s Services or the LSCB which should be sought in line with this policy. 	
<p>Focus Learning Trust Safeguarding Committee</p>	<ul style="list-style-type: none"> • Made up of: <ul style="list-style-type: none"> ○ National Leadership Team members x 2 ○ National Safeguarding Lead (Regional Principal) ○ Head Teachers x 2 • To review Safeguarding Policy and procedures in light of: <ul style="list-style-type: none"> ○ Serious Case Reviews ○ Thematic Case Reviews ○ Changes to statutory guidance and legislation ○ Serious incidents across Focus Learning Trust ○ Complaints ○ Misconduct hearings and disciplinary hearings ○ Internal investigations and reviews ○ Regional Principal reports • To provide recommendations for ongoing improvement to policy and procedures, to be implemented in all campuses. • To meet a minimum of Termly, to undertake duties as above. 	

5.0 REFERENCE DOCUMENTS

Associated Policies

- Anti-Bullying Policy
- Attendance Policy
- Behaviour Management Policy
- IT and E-Safety Policy
- Curriculum Policy documents and schemes of work for PSHE
- Data Protection Policy
- DBS Policy
- Disciplinary Procedure
- Health & Safety Policy including the following procedures:
 - Educational Visits

- First Aid including arrangements for meeting the medical needs of children
 - School Security
- Induction of new staff and volunteers
- Learning Support (SEND) Policy
- Physical Control Policy
- (The) Prevent Duty Guidance
- Recruitment Policy
- Safeguarding Hub – Monthly Newsletter
- Security & Visitors Policy
- Single Central Record
 - Appendix 1
 - Appendix 2
 - Appendix 3
- Staff Handbook
- Staff Code of Conduct
- Whistleblowing Policy

Additional Resource Links

- NSPCC Website Link: <http://www.nspcc.org.uk/>
- NSPCC website link to Preventing Abuse: <http://www.nspcc.org.uk/preventing-abuse/>
- CEOPs Thinkuknow programme – Keeping children safe on-line and protecting them from sexual abuse and exploitation. <https://www.thinkuknow.co.uk/Teachers/>
- Safenetwork website jointly managed by the NSPCC and Children England <http://www.safenetwork.org.uk/Pages/default.aspx>

Legislation

- Working Together To Safeguard Children (March 2015)
- DfE Guidance Keeping Children Safe In Education (September 2016)
- Prevent Duty Guidance: for England and Wales, 2015
- DfE Children Missing in Education (September 2016)
- DfE What to do if you are worried about a child being abused (2015)
- Children and Families Act, 2014
- Childcare Act, 2006
- Counter-Terrorism and Security Act, 2015
- Protection of Freedoms Act, 2012
- Education Act, 2011
- Children and Young Persons Act, 2008

- Education and Inspections Act, 2006
- Safeguarding Vulnerable Groups Act, 2006
- Education (Independent Schools Standards) (England) Regulations, 2014
- Education (Provision of Information by Independent Schools) (England) Regulations, 2010
- UKCCIS (2016) 'Sexting in Schools and Colleges' - Responding to incidents and safeguarding young people'
- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers (March 2015)
- What to do if you're worried a child is being abused – Advice for practitioners (March 2015)

6.0 GLOSSARY

Child – includes everyone under the age of 18 and those under 25 with an EHC plan.

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of children's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes. This includes all forms of maltreatment including Youth Produced Sexual Imagery, peer on peer abuse, cyber bullying and radicalisation.

Child Protection – refers to the process undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Child Abuse – is a term used to describe ways in which children are harmed by someone often in a position of power. Abuse may fall into the categories of physical, emotional (including regular exposure to domestic violence), sexual and neglect (Appendix 5).

Local Authority Designated Officer(s) (LADO) – officers from the local authority designated as being the primary point of liaison in the event of allegations of abuse being made against the headteacher, principal, proprietor or member of governing body.

Designated Safeguarding Lead (DSL) – member of staff in school who leads on Safeguarding and Child Protection – both staff training and management of referrals. Must be a school Senior Leader.

Deputy Designated Safeguarding Lead (DDSL) – Deputy as above

Local Authority – LA.

Local Safeguarding Children Board – LSCB.

MASH – Multiagency Safeguarding Hub. Often the first point of referral from school for a Child Protection case.

Parent – refers to birth parents and other carers of children.

Principle of Proportionality - The least intrusive response appropriate to the risk presented.

Staff – refers to all those working for or on behalf of Gloucester Campus, full time or part time, temporary or permanent, in either a paid or a voluntary capacity.

Youth Produced Sexual Imagery (Sexting) - imagery that is created by under 18s themselves and involves still photographs, video, and streaming described as sexual.

7.0 AUDIT AND ASSURANCE

Element to be monitored	Lead	Tool	Freq	Reporting Arrangements	Acting on Recommendations and Lead(S)	Change in Practice and Lessons to be shared

8.0 APPENDICES

Appendix 1 Concern / Incident Child Protection File Front Sheet, Child Protection Chronology Sheet, Report Form, Referral Form, School Report Form

Appendix 2 Audit Checklist – Safeguarding In Focus Schools

Appendix 3 Power Point Presentation – Safeguarding & Child Protection Basic Training

Appendix 4 Training Log including up-dates on knowledge and skills

Appendix 4A Declaration Form for staff, trustees and volunteers: Keeping Children Safe in Education and Safeguarding and Child Protection Policy

Appendix 5 Recognising the signs of abuse, specific guidance and handout for Basic Training (includes guidance on CSE, youth produced sexual imagery and institutional grooming)

Appendix 6 What to do if you are worried about a child being abused 2015

Appendix 7 Working Together to Safeguard Children, March 2015

Appendix 8 Keeping Children Safe In Education, September 2016 & DfE Statutory Guidance Childcare Disqualification Requirements, February 2015 (currently not applicable to Focus Schools)

Appendix 8A Statutory Guidance on Children Missing Education, September 2016

Appendix 9 Appendix to job description and person specification for the Designated Safeguarding Lead and

Appendix 10a Display notice – Safeguarding Display Posters

Appendix 10b Display notice – Safeguarding local arrangements.

Appendix 10c Display notice – Safeguarding Contacts Poster

Appendix 11 Organisational flowchart

Appendix 12 Keeping Children Safe in Education and Safeguarding Policy Questionnaire

Appendix 14 – Managing a concern about a staff member

Appendix 15 – Managing a concern about Youth Produced Sexual Imagery

Appendix 16 – Managing a concern about Peer on Peer abuse

Appendix 17 – Managing a concern about a child or young person

Appendix 18 – Sexting in School

