

# **SAFEGUARDING POLICY**

**BASTON HOUSE SCHOOL**

**DESIGNATED SAFEGUARDING LEAD:  
LAUREN GIBBS**

**DEPUTY DESIGNATED SAFEGUARDING LEAD:  
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**SAFEGUARDING GOVERNOR:  
NICK SIMPSON**







they should take action to safeguard or promote the welfare of a child who is suffering or is likely to suffer Significant Harm.

## **2.8 Under s31(9) of the Children Act 1989 as amended by the Adoption and Children Act 2002:**

'harm' means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another;

'health' means physical or mental health; and

'ill-treatment' includes Sexual Abuse and forms of ill-treatment which are not physical.

Abuse or neglect is not always easy to identify; staff are more than likely to have some information but not the whole picture.

## **2.9** There are four defined categories of child abuse, which are deemed to be forms of 'Significant Harm':

- Neglect;
- Physical Abuse;
- Emotional Abuse;
- Sexual Abuse.

## **2.10** It is also important to be aware that:

- technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.
- that children can abuse other children (often referred to as peer-on-peer abuse). And that it can happen both inside and outside of school or college and online.

## **2.11 All staff must be aware of the signs and indicators of child abuse.**

## **3.0 Local Arrangements for the school.**

**3.1** All staff must be aware of the local arrangements for safeguarding relevant to the school in which they work; Staff must initially report their concerns to the Inclusion Manager (Deputy Designated Safeguarding Lead) who is first responder for safeguarding.

**3.2** Baston House School safeguarding arrangements are in line with local safeguarding partnership arrangements. The Bromley Safeguarding Partnership consists of the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police force in the local authority area).

**3.4** The Local Authority Designated Officer is Gemma Taylor, telephone 020 8461 7669.

**3.5** All safeguarding referrals must be reported to the local authority for which the pupil resides. Referrals for children and young people under 18 will be dealt with under the Children's safeguarding arrangements, whereas those 18 and above will be dealt with under the Adult Safeguarding Arrangements.

**3.6** If Baston House School think that a child or young person under the age of 18 years old is at risk of being abused or neglected, they will contact the Local Authority MASH Team

using the contact details shared by the Local Authority Safeguarding Partnership. The local authority safeguarding referral procedures (including timescale for response, assessment and outcome) can be found via the Local Authority Safeguarding Partnership website. E.g. <https://www.bromleysafeguarding.org/>

- 3.7** For all referrals regarding radicalisation the DDSL or DSL will follow the prevent strategy and/or radicalisation referral processes for the Local Authority within which the pupil of concern resides.
- 3.8** For all referrals regarding exploitation the DDSL or DSL will follow the appropriate safeguarding referral processes for the Local Authority within which the pupil of concern resides.
- 3.9** Early identification of need is key and where it is felt a pupil or their family may benefit from Local Authority Early Help services, the Family Liaison, DDSL or DSL would make the appropriate referral using the procedures that the Local Authority within the child or family resides.
- 3.10** The Chair of Governors for Baston House School is: Nick Simpson, Regional Director.
- 3.11** The Outcomes First Group Head of Safeguarding can be contacted at: [anne-marie.delaney@ofgl.co.uk](mailto:anne-marie.delaney@ofgl.co.uk)

#### **4.0 The role of Senior Managers and Governor**

- 4.1** Governors must have oversight of safeguarding policies and procedures and ensure that they are being effectively implemented within the school and that training is effective. In line with KCSIE (2021), which states that; '*Governing bodies and proprietors should have a senior board level (or equivalent) lead to take **leadership** responsibility for their schools or college's safeguarding arrangements*'. The named Governor for the school is Nick Simpson.
- 4.2** Like teaching staff and volunteers, senior managers and Governors must be safely recruited and have all relevant checks on file. Please see the Group's Safer Recruitment Policy for further information.
- 4.3** It is the Governors' responsibility to ensure that there is a named Designated Safeguarding Lead (DSL) and that the school contributes to multi-agency working in line with Working Together to Safeguard Children (2018, updated Dec 2020).
- 4.4** Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. This has to be balanced with their duty to protect the victim and other children.
- 4.5** Where the School premises are used for non-school/college activities and the services or activities are provided under the direct supervision or management of the school staff, the schools arrangements for child protection and safeguarding apply. Where service or activities are provided by another body, the School must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and ensure they will liaise with the school on these matters as appropriate.

## 5.0 Designated Safeguarding Lead (DDSL/DSL)

**5.1** *'Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role-holder's job description.'* (KCSIE 2021)

**5.2** The Head Teacher must appoint one individual to be the lead DDSL/DSL and make arrangements for there to be deputy DDSL/DSL in place who will manage any immediate safeguarding incidents in the DDSL/DSL's absence. The DDSL/DSL must be an appropriate senior member of the leadership team and, along with deputies, will receive DDSL/DSL training every two years.

**5.3** The Head Teacher must ensure that job descriptions for DDSL/DSL and Deputy DDSL/DSLs are kept on personnel files and clearly state their responsibilities.

**5.4** The DDSL/DSL (or deputy) must always be available during school hours for staff to discuss any concerns.

### **5.5 The main responsibilities of the Designated Safeguarding Lead (DDSL/DSL) are to:**

- provide support to staff regarding safeguarding concerns;
- lead on advising staff of any action to be taken due to a safeguarding concern;
- ensure that children and young people are immediately safeguarded from harm and abuse;
- ensure that there is appropriate cover during their absence, and that staff know who to approach if the DDSL/DSL is unavailable;
- liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries;
- adopt a child-focused and holistic approach ensuring the child's wishes and feelings are taken into account when determining what action to take
- refer allegations to the Local Authority Designated Officer or equivalent;
- refer safeguarding concerns to placing and host local authorities;
- refer suspected cases of radicalisation to Channel;
- refer suspected case of Female Genital Mutilation to the police;
- refer suspected cases of Child Sexual Exploitation and trafficking to the police;
- refer cases to the Disclosure and Barring Service after staff have been dismissed or there is suspected harm having been caused to children and young people;
- liaise with Outcomes First Group Quality Assurance Team and HR Team if any allegations or suspected harm having been caused to a child by an employee, supply staff or volunteer for Outcomes First group;
- ensure that the school complies with the work of the local safeguarding partnership.
- Ensure that all staff receive regular update training in relation to safeguarding;
- provide safeguarding updates to senior managers and school governors;
- ensure that there is effective monitoring and oversight of all safeguarding concerns;
- promoting the educational achievements of Looked After Children in line with the Children and Social Work Act 2017.

**5.6** It is important that all staff understand the role of the DDSL/DSL on their appointment within the school and as part of their induction. The DDSL/DSL is responsible for ensuring that all staff understand their roles and responsibilities regarding safeguarding children and that a child focused approach is taken. The DDSL/DSL will assess safeguarding concerns within the context of young people's environments. This is known as contextual safeguarding.

**5.7** The DDSL/DSL must ensure that clear, concise and good quality documents are kept of all allegations or safeguarding concerns. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

**5.8 Data protection and GDPR are not barriers to record keeping or information sharing when promoting children's welfare.** Schools and colleges have clear powers to share, hold and use information for these purposes. The school should have clear arrangements in place for the processes and principles for sharing information within the setting and other Outcomes First Group Divisions and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required. Staff are required to be proactive in sharing information as soon as possible when it is in relation to a child's safety or wellbeing.

**5.9** When young people move schools or move into further or higher education, the DDSL/DSL is responsible for ensuring that the necessary information is shared with the new school or college. It is the DDSL/DSL's responsibility to ensure that a pupil's child protection file is transferred to the new school or college as quickly as possible and as securely as possible. Confirmation of receipt must be obtained. **Files must be transferred securely.** Schools must inform their Local Authority of all deletions from their admission register when a child is taken off roll.

**5.10** Consideration must be given to sharing information verbally with the new school or college prior to the child or young person leaving. The DDSL/DSL must ensure that confidentiality of any third parties is not breached and that they comply with GDPR. Records must contain factual information and must not be speculative. These documents must be kept confidential with the exception of sharing them with relevant professionals as part of safeguarding and protecting the child or young person. Records must be updated, and any actions must be followed up and completed. It is the responsibility of the DDSL/DSL to ensure that a safe and satisfactory outcome has been reached and that all actions have been completed.

## **6.0 Safeguarding Training and Updates for all staff**

**6.1** Governing bodies and proprietors should ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety, and the



requirement to ensure children are taught about safeguarding, that safeguarding training for staff is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. They must regularly review the training programme to ensure that it includes all the required knowledge and that staff understand how it is to be implemented.

Whilst considering the above training requirements, governing bodies and proprietors should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.

**6.2** This policy **must** be read in conjunction with Keeping Children Safe in Education (2021). **All staff are expected to follow this policy and statutory guidance including KCSIE 2021.**

**6.3 All staff must read the following documents:**

- Part 1 (or Annex A where appropriate) of [KCSIE 2021](#)
- The school's Restrictive Physical Intervention Policy
- The school's Anti-bullying policy
- Outcomes First Group's Peer-on-peer abuse policy
- Outcomes First Group's Exploitation policy
- Outcomes First Group's Protecting Children from Radicalisation policy
- Outcomes First Group's Harmful Sexual Behaviours policy
- Outcomes First Group's Safer Recruitment policy
- Outcomes First Group's Data Protection policy
- Outcomes First Group's Web Filtering policy
- Outcomes First Group's Staying Safe Online
- The school's Whistle blowing and complaints policy
- The school's staff behaviour policy (Code of Conduct)
- The school's description and guidance of the role of the DDSL/DSL
- The school's description and guidance of the role of the Deputy DDSL/DSL
- [DfE guidance on sexual violence and harassment between children in schools and colleges](#)
- [DfE guidance on Children Missing in Education](#)
- [DfE guidance on Promoting the Education of Looked After Children](#)
- [DfE guidance on Teaching Online Safety in Schools](#)
- [DFE Guidance on Sharing nudes and semi-nudes advice for education settings working with children and young people](#)
- [DFE Guidance on Searching, Screening and Confiscation](#)

**6.4** Safeguarding updates must be regularly provided to staff, either through face-to-face training, meetings or through regular written updates.

- Face to face safeguarding training must be provided (and recorded) to **all staff at least annually.**
- **DDSL/DSL** must refresh their advanced training **at least every two years.**

**6.5** All members of school leadership teams, including the Head Teacher and DDSL/DSL should also be familiar with **Working Together to Safeguard Children 2018** (updated Dec 2020).

## 7.0 Roles and Responsibilities of Staff

**7.1** Outcomes First Group recognises that it is not just one person's role to safeguard children, it requires a collective approach to safeguarding. All Outcomes First group employees must understand their roles and responsibilities regarding keeping children safe and reporting concerns.

**7.2** During staff induction, staff will receive safeguarding training, including online safety. Staff must be familiar and understand the role of the DDSL/DSL, the local safeguarding partnership and the individual systems relating to safeguarding within the school. Staff must also know, understand and implement the school's behaviour management policy, the child protection policy, the school's code of conduct, the safeguarding response to children who go missing from education and Keeping Children Safe in Education 2021, Part 1.

### 7.3 Staff are responsible for:

- compliance with Outcomes First Group policies, statutory guidance and legislation including Keeping Children Safe in Education (2021) and Working Together to Safeguard Children 2018 (Updated Dec 2020);
- understanding the role of the DDSL/DSL;
- helping to develop and deliver a curriculum which helps children and young people to understand about abuse, appropriate and safe relationships with adults and peers, and keeping safe both online and offline;
- helping to provide an environment where children and young people feel safe and valued;
- attending training and meetings;
- ensuring that they fully understand how to report concerns and if not, asking for further training and support;
- understand the safeguarding response to children who go missing from education;
- listening to children and young people;
- supporting children and young people if they disclose safeguarding information;
- ensuring that they are alert to signs of abuse by peers or adults;
- ensuring that they are aware of indicators or possible signs of neglect;
- ensuring that they closely monitor any possible signs of abuse or harm for those children who are unable to communicate verbally or who have complex health and care needs;
- keeping sensitive information confidential and sharing it only with those professionals for whom it is relevant;
- helping to identify those children or young people who may benefit from Early Help;
- helping to implement Child Protection Plans.

**7.4** Staff are in a close position to children and young people within schools as they know the children and young people. They have regular contact with them and so are in the best position to know if a child or young person is behaving in a way which could possibly indicate that they are being hurt or harmed. Any concerns, whether these are nagging doubts, worries, concerns or based on information told to them, must be reported immediately to the DDSL/DSL both verbally and in writing. **It is the staff member's responsibility to ensure that this information is acted upon. They have a duty to follow up with the DDSL/DSL to ensure that action has been taken.**

## 8.0 Safer Recruitment





- 10.4** Staff must prioritise the child or young person's immediate safety. They must remain professional and adhere to all safeguarding and confidentiality procedures. After sharing the information with the DDSL or DSL, they must not share it with anyone else.
- 10.5** On receipt of the information, the DDSL/DSL must consider all information and then, in cases of serious concern, report this within **one working day** to the host authority, placing authority, Regional Director for Education and care and where relevant, the Local Authority Designated Officer.
- 11.0 Managing Referrals to DBS and professional bodies**
- 11.1** This may include referrals to Disclosure and Barring Service, Social Work England, or other professional bodies including the Care Council for Wales (CCW), and/or the Scottish Social Services Council (SSSC), Northern Ireland Social Care Council (NISCC) or Teacher Regulation Authority.
- 11.2** A Sub-Committee of the Outcomes First Group Safeguarding & Quality Committee takes an overview of all professional conduct issues to ensure the Group is compliant and consistent with all legal duties relating to referrals to professional bodies and the Disclosure and Barring Service.
- 11.3** Outcomes First Group managers must notify the Safeguarding Sub-Committee of all referrals and potential referrals to the Disclosure and Barring Service or any relevant professional body in the UK.
- 11.4** All professional conduct issues which may require a referral to a professional body, whether they relate to safeguarding children or not, must be referred to this sub-committee. For example, a teacher may be prohibited from teaching for a wide range of reasons which do not relate to the safety of children or young people.
- 11.5** The Safeguarding Sub-Committee will support the decision-making process to refer an employee to a professional body and/or DBS and make it clear who is responsible for the submission of any relevant documentation. This will normally be delegated to a senior manager within the division.
- 11.6** If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to the Disclosure and Barring Service or relevant government body in Scotland or Northern Ireland must be made. **It is an offence not to make a referral to the Disclosure and Barring Service in England and Wales.**
- 11.7** If a DBS referral is made, at the point of completion Outcomes First Group managers must notify the Group Head of Safeguarding and the Human Resources Operations Advisor of the referral and any other possible referrals to any relevant professional body in the United Kingdom, relating to the allegation made.
- 11.8** Where a teacher is dismissed or their services are no longer used because of serious misconduct or might have been dismissed or services ceased to be used had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

## 12.0 Partnership working and sharing information

**12.1** Partnership working and the sharing of information is key in keeping children safe. Everyone who has a role to play in caring for children has a duty to share good quality information with the relevant professionals in a timely manner.

## 12.2 General Data Protection Regulations

All schools must ensure that they comply with the Outcomes First Group's Data Protection policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to children and young people's personal information, as well as that of staff and parents/carers.

**The GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on.** It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required.

**All staff must complete the GDPR training. All staff have a responsibility to ensure that they comply with the GDPR requirements.**

**12.3** Schools must ensure that they inform pupils, parents and carers of how their personal information will be stored and used.

**12.4** Schools must ensure that they hold emergency contact details of the parents/carers of pupils. This is to be done with the agreement of the parents/carers. In line with KCSIE (2021) schools must hold more than one set of contact details for each pupil, where reasonably possible.

**12.5** Data breaches must be reported immediately to the Data Protection manager as set out in the Data Protection Policy.

## 13.0 Peer on Peer Abuse

**13.1** It is essential that all staff understand that abuse is abuse and the importance of challenging inappropriate behaviours between peers. In addition to the information below, staff should familiarise themselves with the Outcomes First Group's **Peer-on- Peer abuse Policy**.

KCSIE (2021) states: **"Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it."**

**13.2** Staff must ensure that they create a school environment where children and young people's safety is paramount and where unacceptable or unsafe behaviour is not tolerated. Staff must be aware and alert to incidents of online abuse between children, consensual



harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.

**13.8** DDSL/DSL must deal with any concerns of peer-on-peer abuse immediately and sensitively. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.

**13.9** The language used must be sensitive, non-judgemental and must not blame the victim. Victims must be supported and reassured that their safety and welfare within the school is the priority. Risk assessments must be implemented where necessary.

**13.10** Where the DDSL/DSL believes that there has been significant harm caused to the pupil, a referral must be made to the local authority immediately. In agreement with the local authority, parents/carers must be informed. Where possible, as best practice, parents/carers are to be informed face to face.

**13.11** If the local authority does not believe it meets their threshold for further action and the DDSL/DSL is not in agreement, this must be challenged with the local authority.

#### **13.12 After the outcome/conclusion of the incident:**

- a contextual safeguarding approach must be taken;
- schools must take all necessary action to learn from the incident and prevent future incidents from occurring, such as through targeted education around specific types of peer-on-peer abuse;
- support for the victim must be offered and provided where possible. Appropriate risk assessments must be implemented to provide reassurance and safety for the victim;
- schools must ensure that they **do not** adopt a victim blaming approach;
- the DDSL/DSL must complete an investigation into the incident; The investigation must consider the incident itself as well as whether it is an isolated incident, and the personal circumstances of the young person who is alleged to have displayed harmful behaviour;
- if necessary, appropriate referrals must be made to support services for the young person who has displayed harmful behaviours;
- a risk assessment must be completed and implemented for the young person who has displayed harmful behaviours in order to safeguard them and other pupils.

### **14.0 Bullying**

**14.1** Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children should have adequate policies, procedures and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable.'

**14.2** Outcomes First Group has a zero-tolerance approach to bullying. All staff have a responsibility to challenge all bullying. Staff must help children and young people to understand what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Staff must report any bullying concerns to the DDSL/DSL **on the same day**. The concerns must be documented appropriately.



- 14.3** Schools have a responsibility to ensure that those children and young people who bully, are supported and helped to understand the impact of their actions.

The government has produced the following guidance on Preventing and tackling bullying, mental health and behaviour in school:

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

See [Rise Above](#) for links to materials and lesson plans

- 14.4** For further information please refer to the school's anti-bullying policy, child protection policy, the Web Filtering policy, and the DfE guidance [Sexual violence and sexual harassment between children in schools and colleges](#) (Sept 2021)

- 14.5 All staff have a responsibility to report any suspicions or concerns that a child has or may be mistreated or harmed.**

## **15.0 Preventative Strategies**

- 15.1** The school will take all appropriate action to ensure that children and young people learn about appropriate relationships with adults, keeping safe, online safety as well as sex and healthy relationships. Relationship, Health and Sex Education (RSHE) lessons, Relationships Education, and Relationships and Sex Education will focus on important age-appropriate issues in line with Government guidance. Staff must ensure that children and young people have opportunity to learn about safe relationships between peers as well as who they can talk to if they have any concerns.

A one-stop page providing teachers with support in teaching RSHE topics can be found here: <https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health>

- 15.2** Children should be supported by staff to understand what abuse is. Children must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse. This should include being able to access in private, relevant websites or help lines such as Childline to seek advice and help.
- 15.3** The school recognises that some children and young people are more vulnerable by virtue of their complex health or behavioural needs, or disabilities. In these instances, all staff have a responsibility to be the 'eyes and ears' and report all concerns to the DS Lead.
- 15.4** For further information, refer to Part 5 of Keeping Children Safe in Education (2021) 'Child on Child Sexual Violence and Sexual Harassment'.

## **16.0 Online Safety**

- 16.1** There is a whole school approach to online safety to help equip pupils with knowledge and understanding to stay safe online. The school helps and supports its pupils to recognise and avoid online safety risks and to help build their digital resilience. This is integrated into everyday learning and covered in detail as part of the RSHE curriculum. There are a range of resources to provide support for online safety in schools at:

<https://www.childnet.com/teachers-and-professionals>

**16.2** The Outcomes First Group requires safe and secure systems to be put in place within schools that limits the exposure to such risks. Please see the Group Web Filtering Policy that is updated for schools each year and the Group's Staying Safe Online Policy.

KCSIE (2021) states that the school should have a clear policy on the use of mobile and smart technology. Schools are required to develop a local policy.

**16.3 If a member of staff has reason to believe that a child or young person is experiencing harm or is at risk of harm, the reporting process set out in this policy in Section 10 must be followed immediately.**

**16.4** If staff become aware of an online incident that is a cause for concern, they should:

- Provide reassurance to the child or adult.
- Take immediate action to report any criminal offences to the police and social care.
- Inform the child or adult's placing authority and family as appropriate.
- Review the supervision and support arrangements for the child accessing the internet.
- Check the privacy and security settings on the child's devices and account.
- Agree what action will be taken to prevent recurrence and reduce risk, the risk assessment should be reviewed and updated. Further online safety learning requirements should be considered for the child.

**16.5** Digital technology and its related risks are developing rapidly. An annual review of the school's approach to online safety will take place, supported by an annual risk assessment that considers and reflects the risks children face. A free online safety self-review tool for schools can be found at <https://360safe.org.uk/>

**16.6** The UKCIS external visitors' guidance highlights a range of resources which can support educational settings to further develop a whole school approach towards online safety: <https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings>

## **17.0 Children Missing Education**

**17.1** All staff must be aware of the risks associated with children who go missing from education, and particularly that very often missing incidents are a warning sign of other safeguarding concerns such as exploitation, forced marriage, FGM, substance misuse or mental health problems. The risk of exploitation and abuse increases for those children and young people who go missing from home and school.

Early identification and intervention is a priority. Schools must have appropriate procedures in place for monitoring the attendance of children and young people in school. Attendance must be monitored through Senior Leadership Team Meetings and Governance.

**17.2** The DDSL/DSL must contact the main emergency contact as detailed on the pupil's file should there be concerns regarding the pupil missing education.

Staff must report all unauthorised absences to the DDSL/DSL, who must make contact with the child or young person's parent/carer immediately to establish the child or young person's whereabouts. The DDSL/DSL must inform the placing authority of a pupil's poor attendance.

**17.3** The DDSL/DSL is responsible for investigating any unexplained absences. Reasonable enquiries must be made to locate a child or young person who is missing from education. The DDSL/DSL **must** refer any safeguarding concerns regarding the absence of a pupil to the local authority. Cases where there are concerns regarding forced marriage or FGM must be referred to the police immediately. All information **must** be documented appropriately.

**17.4** Children and young people who are repeatedly missing from education are at particular risk of harm. Attempts must be made to talk to the child or young person about why they are missing from education. Records must be kept of those discussions. Any safeguarding information which the child or young person discloses must be shared **immediately** with the local authority. If the child or young person discloses immediate safeguarding concerns, the DDSL/DSL must share this information with the police.

## **18.0 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

**18.1** Exploitation of children and young people is a form of child abuse and can include sexual exploitation or criminal exploitation. This occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and /or for financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

**18.2** CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that both boys and girls can be at risk of criminal exploitation. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

**18.3** Schools must write and implement a local exploitation procedure which staff must be familiar with. All staff **must** read Outcomes First Group's Exploitation policy as well as refer to Keeping Children Safe in Education (2021).

**18.4** All staff **must** know the definitions, signs and indicators of CSE, CCE and County Lines. DDSL/DSL must provide ongoing training and learning to staff around exploitation. All staff **must** have training in exploitation.

**18.5** Staff **must** report any concerns regarding exploitation **immediately** to the DDSL/DSL and document their concerns appropriately **on the same day**. Where there are immediate concerns relating to children and young people's safety due to exploitation, DDSL/DSLs must make a same day referral to the local authority and report the concerns to the police as well as to the Regional Director for Education and Care.

**18.6** Where there are low level concerns, i.e. where the behaviour towards a child does not meet the threshold of harm, the DDSL/DSL must document the concerns on a chronology in order to establish a full picture of what is happening for the child or young person.

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is not considered serious enough to consider a referral to the Local Authority Designated Officer or equivalent. Examples may include but are not limited to: being over friendly with children; having favourites; engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or using inappropriate sexualised, intimidating or offensive language.

**18.7** It is everyone's responsibility to help children and young people know about grooming and exploitation. Schools must ensure that children and young people know who to talk to if they have any concerns for themselves or other children.

## **19.0 Serious violence**

**19.1** All staff should be aware of indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

**19.2** All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Further guidance for professionals can be found here:

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

## **20.0 Female Genital Mutilation**

**20.1** In line with KCSIE (2021), teachers have a legal duty to share concerns regarding FGM; 'If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police'. In suspected cases of FGM, staff must refer to the local authority as well as the police. The DDSL/DSL will assist and support staff with this.

**20.2** Staff must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet': <https://www.gov.uk/government/publications/female-genital-mutilation-leaflet>

**20.3** The DDSL/DSL must ensure that immediate concerns regarding potential abuse, harm, honour-based abuse including FGM, forced marriage and breast ironing, CSE and

Trafficking or Radicalisation are shared **immediately** with the relevant Regional Director for Education and Care (and Chair of Governors) and that staff have documented them appropriately.

## **21.0 Preventing Radicalisation**

**21.1** Outcomes First Group fully recognises its responsibility to have arrangements in place to safeguard and protect children from radicalisation. Section 26 of the Counterterrorism and Security Act 2015 places a statutory responsibility on schools to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the 'Prevent' duty.

**21.2** All staff must be aware of the signs and indicators of radicalisation. Staff must be proactive in reporting any concerns, regardless of how small they may be, to the DDSL/DSL who must assist staff to report all concerns regarding radicalisation to the Police as well as the Regional Director for Education and Care. Staff must document their concerns appropriately.

**21.3** All staff must be aware of the local procedures relating to reporting radicalisation concerns.

## **22.0 Children Requiring Support with their Mental Health**

**22.1** Outcomes First Group recognises that schools have an important role in supporting the health and wellbeing of children and young people. Mental ill-health can be an indicator of a child suffering or at risk of abuse, neglect or exploitation. All schools should have systems in place for identifying mental health problems and referring to appropriate agencies for additional support. This will ordinarily be with the consent of the child and their family. All details of concerns and any referrals or other support arranged for the child should be documented on the schools electronic recording system.

**22.2** Schools can refer to the Mental Health and Behaviour in Schools guidance (2018) <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2> The guidance provides advice on how to create a whole school culture in promoting positive mental health outcomes for children and young people.

## **23.0 Physical Interventions**

**23.1** While every school creates an atmosphere of nurturing, unconditional positive regard and warmth, Outcomes First Group recognises that on occasion it may be necessary to use physical intervention to keep a child or young person safe. Physical intervention must be a last resort and must always be proportionate. Once the child is safe and calm, it is essential that there is a debrief with the child. It should be an open discussion with the member of staff encouraging the child to talk about how they feel and understand what happened.

The intervention and the follow-up action must be recorded on the School's Electronic Recording System.

## **23.2 All staff must read and know the school's individual Physical Intervention Policy.**

**23.3** If a child or young person makes an allegation after a physical intervention, it is important that the member of staff writes down as much information as possible. Staff must complete body maps immediately after the event and make an appropriate electronic record. Staff must also verbally inform the DDSL/DSL (or deputy) as well as recording it onto the schools electronic recording system. **Medical attention must always be sought for the young person.** Staff must inform their parents or carers. Allegations of harm relating to physical interventions must be reported to the Regional Director for Education and Care, the Group Head of Safeguarding ([anne-marie.delaney@ofgl.co.uk](mailto:anne-marie.delaney@ofgl.co.uk)) Local Authority Designated Officer or equivalent.

## **24.0 Allegations against Staff**

**24.1** An allegation is any concern, complaint or disclosure that indicates a member of staff, agency staff or volunteer or has:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or relate to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

**24.2** All allegations must be treated seriously. Staff must maintain an open mind and suspend all judgement. Allegations must never be dismissed. When managing allegations, it is important that staff maintain a level of professional curiosity. Staff have a responsibility to look after themselves and not to place themselves into situations which could present as unsafe. Staff must report any concerns to the Regional Director for Education and Care and the DDSL/DSL.

**24.3** When a child makes an allegation about a member of staff, the member of staff receiving the complaint must:

- write everything down and document it on the electronic recording system used by the school.
- immediately report the allegation to the DDSL/DSL (or deputy).

The DDSL/DSL must:

- take all allegations seriously regardless of whether a child or young person has made previous allegations and can speak to the Local Authority Designated Officer or equivalent and seek advice about next steps on the same day.
- Must report allegations to the Local Authority Designated Officer or equivalent within one working day.
- Ensure that they follow the Outcomes First Group's Managing Allegations Procedure.

**24.4** Part four of Keeping Children Safe in Education (2021) outlines the importance of retaining oversight of any concerns or allegations about agency or supply staff, volunteers or any member of staff employed by a third party working in the school setting. Whilst the

individual may not be employed by Outcomes First Group, **schools must ensure** that allegations are managed properly. KCSIE (2021) states *'In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools of colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation.'*

**24.5** If the allegation is regarding the Head Teacher/Principal then the Regional Director for Education and Care must be informed immediately. They will then seek advice from the Local Authority Designated Officer (or equivalent).

**24.6** **All allegations made against staff must be reported to the Regional Director for Education and Care and HR and the Group Head of Safeguarding, and to [safeguarding@ofgl.co.uk](mailto:safeguarding@ofgl.co.uk). Outcomes First Group recognises that managing allegations can be challenging and so will support with the process.**

**24.7** It is the responsibility of the DDSL/DSL to ensure that all allegations are managed in line with local safeguarding partnership procedures.

## **25.0 Working with the Local Authority Designated Officer (or equivalent)**

**25.1** In all referrals, the DDSL/DSL is the lead professional within the school for ensuring that a timely response is received from the local authority. If a response is received which the DDSL/DSL believes is inappropriate and does not prioritise the child or young person's safety, this must be escalated to the Head Teacher or Governors of the school to agree further action.

## **26.0 Whistleblowing**

**26.1** Safeguarding is everyone's responsibility. Outcomes First Group recognises that on occasion staff may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns that they may have. The Group also recognises that children will be unable to voice their concerns if they are in an environment where staff also fail to voice their concerns.

**26.2** All staff have a duty first and foremost to the children in their school. Any concerns, regardless of how small they may seem, must be reported. DDSL/DSLs and Head Teachers have a responsibility to ensure that they create an environment where staff feel safe to openly voice any concerns and feel listened to. It is also important that staff feel supported if concerns are raised about them. If staff see or hear about other colleagues' practice which they are concerned about, which potentially may cause emotional or physical harm to a pupil, or if the standard of care being provided falls short of expectations, they must report this.

**26.3** Outcomes First Group has an anonymous telephone support system (Safecall) where staff are able to share any concerns that they may have, safely and without fear of reprisal. All whistleblowing concerns will be taken seriously and treated as such.

**26.4** Staff can call Safecall on **08009151571**, report online **www.safecall.co.uk/reports**, or email **outcomesfirstgroup@safecall.co.uk**

## **27.0 Covid-19 and disruption to schools**

**27.1** The Covid-19 Pandemic has caused significant disruption to education settings during the last two academic years. The safeguarding of children and young people always remains the highest priority in all circumstances. Whilst it is anticipated that the impact of Covid-19 will decrease, the school continues to have clear procedures in place for reducing the risk and spread of infection, managing cases/suspected cases, self-isolation and remote learning.

**27.2** The School will:

- Keep up to date with the latest government legislation and guidance and ensure it is followed.
- Follow the system of controls to minimise the risk of infection.
- Have a contingency plan in place for outbreaks in the school or changes in restrictions
- have a remote learning plan in place for pupils to follow and engage in if and when required.
- Staff and children reporting to be symptomatic will be sent home and asked to arrange to have a PCR test as soon as possible and report the result to the school.
- Communicate any changes in processes to parents/carers.
- Regularly review its arrangements and, where necessary, update its risk assessment.

**27.3** Each school will have individual arrangements and characteristics that may require site-specific arrangements. In such cases, the Regional Director of the setting should be informed.

All staff should continue to have full regard to KCSIE (2021) and all Outcomes First Group procedures, including the Safeguarding and Managing Allegations against Employees policies. This applies at all times, when working online or offline, remotely or at a setting.

## **27.4 Designated Safeguarding Lead**

In circumstances where remote learning takes place, staff and pupils must all know how to contact both the DDSLs and DSL. A contingency plan should be in place should the DDSL/DSL become unavailable for work and the current deputising arrangements become depleted. This may be that an alternative senior leader has a buddying arrangement with a DDSL/DSL from another setting for support should this be required.

Arrangements for reporting and accessing electronic and paper record keeping systems must be in place. If a member of the team is unable to attend work due to self-isolation, they may be able to continue to function as part of the DDSL/DSL team remotely with this access. Sensitive or confidential case-related information must not be removed from the school to take to another location for remote working. Consider other mechanisms to access the information securely.





- If the school is unable to make contact with any child or young person this must be considered as a potential safeguarding or child protection matter and make a referral through local safeguarding arrangements.

The following guidance is available:

<https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19>

<https://learning.nspcc.org.uk/news/covid/undertaking-remote-teaching-safely>

<https://www.pshe-association.org.uk/guidance-teaching-pshe-remotely>

## 27.6 Digital Learning

Where possible digital learning options for children and young people will be made available if they are having to learn remotely. All staff should be mindful that the Outcomes First Group's and school's safeguarding policies & procedures and Code of Conduct & Ethics Policy continue to apply, at all times when working online or offline at any location.

**27.6.1** Acorn Digital Learning have produced a Live Online Risk Assessment, and Student Remote Learning policy and template, that have been shared with all Outcomes First Group schools and can be utilised as required.

**27.6.2** Data protection and GDPR considerations must be taken into account. This includes rules on signing pupils up to online services, and staff accessing personal data when working at home. It is recommended that staff are regularly reminded of the data protection and GDPR policies and procedures, whether they are working from school or remotely.

**27.6.3** The guidelines for digital learning below must be followed:

- Ensure parents and carers are aware of online safety advice and resources such as [Thinkuknow](#) and [Safer Internet Centre](#)
- A link to [ParentInfo](#) should be on the school's website – this DfE backed website provides parents with up-to-date information about a range of topics.
- If staff are concerned about a comment made online by a pupil or the work they share, the staff member should take a screen shot and report it to the DDSL/DSL via MyConcern / CPOMS (or the school's existing protocol as long as it is secure).
- Staff and pupils should be fully dressed and take into account the background/surroundings. Staff should use a communal area, and anything in the background that could cause concern or identify family members/ personal information, should be removed or a sheet should be used.
- The teacher may need to give guidance to pupils to remove items from view. If a pupil is inappropriately dressed or in an unsuitable setting (e.g. a bedroom) they must be removed from the video call.

- Staff must not enter into one-to-one tuition voice or video call with an individual pupil or student without SLT agreement. If there is a need for single pupil interaction, please ensure that a colleague is added to the call, or that a parent is present with the pupil
- If a staff member urgently needs to call a parent or pupil from their personal phone, the number must be withheld by dialling 141 first and a record of the call must be made (e.g. an email to the HSM, DH or DDSL/DSL to explain the purpose of the call and any actions taken as a result of it)
- Home filters may block different content at a different level to the school's filtering software; if this appears to be the case for one pupil in the group the teacher should revert to or suggest an alternative resource.
- Take care that any material provided to students to watch is age and developmentally appropriate. For instance, do not ask Year 9 pupils to watch a film with a 15 rating.
- Staff should model good online behaviour in all ways, including the language used to interact with pupils and colleagues, which should be respectful at all times
- School leaders should make clear to staff the operating times for online learning (for example, only during the normal school day); no staff member should engage with or respond to any pupil outside these times.
- Clear guidelines for students connecting to a virtual classroom session will be given by the school and the teacher will check their understanding.
- The same principles apply to virtual meetings between staff and parents as face-to-face meetings

### **27.7 Home visits**

Where staff need to make home visits, they should be mindful of their own wellbeing and safety if conducting visits to the homes of children and their families. Follow the school's lone working procedure and guidance. This should prescribe that you must at least inform another member of staff of your whereabouts and the time you plan to return to the school. Wherever possible, arrange for a colleague to accompany you. This is particularly important for visiting households with identified risks to the safety of professionals. You should discuss and assess those risks with the appropriate local authority.

### **28.0 Policy Review**

This policy will be reviewed annually, as a minimum to ensure it is kept up to date with safeguarding issues as they emerge and evolve. Where necessary, updates will be made during the year.