

SAFEGUARDING AND CHILD PROTECTION POLICY

Policy Review Date: September 2021

Version	Date	Updated By
1.2	September 2018	G. Mann
1.3	October 2018	G. Mann
1.4	April 2019	S. Smith
1.5	September 2019	S. Smith
1.6	February 2020	S. Smith
1.7	September 2020	P. Holness
1.8	February 2021	S. Smith



Further Information on safeguarding and child protection policies and procedures can be accessed through:

Dudley Safeguarding People Partnership Board (DSPPB): www.safeguarding.dudley.gov.uk

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1. Policy statement

1.1 Outcomes First Group (OFG) is committed to ensuring that children and young people are effectively safeguarded in all services including fostering, schools and residential homes at all times. This policy applies when working online and offline, in settings and in all virtual communications. The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.
- Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

Our Policy at Outcomes First reflects that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges.

Our school understands that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability, without further exploration.
- That they may be more prone to peer group isolation than others.
- The potential to be disproportionately impacted by things like bullying, without outwardly showing signs.
- Communication difficulties in overcoming these barriers.

1.2 All Outcomes First Group employees **must** ensure that:

- they are familiar with Part 1 of Keeping Children Safe in Education (2020 and January 2021 updates);
- children and young people feel safe and that they are listened to;
- they create an environment in which children and young people feel valued;
- safer recruitment procedures are rigorously followed (please refer to the Outcomes First Group Safer Recruitment Policy for further details);
- they understand their roles and responsibilities in keeping children and young people safe through ongoing learning, development and supervision;
- they are vigilant in monitoring possible signs of abuse including for those children and young people who have complex learning difficulties or specific communication needs;
- they are vigilant in monitoring children's attendance in School and aware of the risk of children going frequently missing from education or missing from care or home;
- they follow the appropriate procedures in place for sharing safeguarding concerns and that these are shared with relevant professionals in a timely manner;
- they understand and implement local safeguarding procedures as set out in local authority arrangements;
- arrangements are in place to effectively implement the Prevent Strategy and Duty;
- children and young people have opportunity to learn about appropriate relationships with adults and recognise unacceptable behaviour by adult;

- a clear commitment to ensure C & YP are treated fairly, protected and free from discrimination on the grounds of race, religion, gender, age, disability and sexual orientation;
- there are definitive whistle-blowing procedures, and a culture that enables issues about safeguarding and promoting the welfare of children and young people to be addressed.
- We give special consideration to children who:
 - Have special educational needs (SEN) or disabilities
 - Are young carers
 - May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
 - Have English as an additional language
 - Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
 - Are at risk of FGM, sexual and criminal exploitation, forced marriage, or radicalisation
 - Are asylum seekers
 - Are at risk due to either their own or a family member's mental health needs
 - Are Children in Care or previously Children in Care

2. What is safeguarding and child protection?

2.1 Safeguarding

Safeguarding relates to the action taken to promote the welfare of children and young people to protect them from harm. Section 175 of the [Education Act 2002](#), places a duty on schools and local authorities to safeguard and promote the welfare of pupils. This policy includes the safeguarding of young adult learners within Outcomes First Group schools and other settings, both offline and online.

Guidance has been developed to assist educational senior leadership teams to give full consideration to safeguarding matters as part of managing the changes and challenges during the Covid-19 outbreak. The guidance is attached at Appendix 1: Covid-19 Safeguarding Practice Guidance for Educational Settings.

2.2 Safeguarding is defined in Working Together to Safeguard Children (DfE, July 2018) as:

- Protecting children from maltreatment;
- Preventing impairment of children's health and 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.

2.3 OFG adopts a contextual safeguarding approach to safeguarding and child protection.

Contextual safeguarding is: *'...an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.'* (Dr Carlene Firmin)

2.4 Child Protection

Child protection is an important aspect of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to

suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

2.5 Safeguarding is everyone's responsibility

While local authorities and placing authorities have statutory responsibilities regarding safeguarding, Outcomes First Group believes that safeguarding is everyone's responsibility. Outcomes First Group expects that staff keep the child or young person at the centre of all that they do and that any actions taken are in the best interests of the child. We also expect that children and young people are listened to and their voices are always heard. This is without exception and regardless of whether the child or young person is being cared for in a residential setting, foster home or being educated within school.

2.6 Defining Significant Harm/Child Abuse

'Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including: sexual, physical and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should put the needs of children first when determining what action to take' (Working Together to Safeguard Children July 2018).

2.7 The Children Act 1989 introduced the concept of 'Significant Harm' as the threshold that justifies compulsory intervention in family life in the best interests of children. Under Section 47 of the Act, local authorities have a duty to make enquiries to decide whether 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 assumed to be forms of 'Significant Harm':

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

Please see Appendix 2 for terms and definitions.

2.10 All staff must be aware of the signs and indicators of child abuse.

2.11 Domestic Abuse

Domestic abuse can take many forms, including psychological, physical, sexual, financial

and emotional. Our school recognises that exposure to domestic abuse can have a serious, long-term emotional and psychological impact on children. We work with other key partners and share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm.

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

Older children may also experience domestic abuse and/or violence in their own personal relationships. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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

24-hour National Domestic Abuse Helpline 0808 2000 247

3. 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. It is the responsibility of all staff within The Wenlock School (employed, volunteers, contractors, agency) to safeguard and protect pupils.
- 3.2** The local arrangements for The Wenlock School are as follows:
- 3.3** The Wenlock School safeguarding arrangements are in line with Dudley Safeguarding People Partnership Board (DSPPB). Children Board's framework and policies, Procedures and Training Strategy and reflects what Dudley Safeguarding Children's Board considers to be safe and professional practice in this context. Child Protection has to be considered within professionals' wider "safeguarding" responsibilities that include a duty to co-operate under the Children Act 2004 and takes account of the need for children to 'be healthy' and 'stay safe'. The local 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/Designated Officer is Yvonne Nelson-Brown: 01384 813110 mob: 07811991432 email: YvonneNelson-Brown@dudley.gov.uk
- 3.5** All safeguarding referrals must be reported to the local authority 0300 555 0050. Referrals should be made by completing a Multi-Agency Referral Form (MARF) and returning it to: childrensMASH@dudley.gcsx.gov.uk
- 3.6** The local authority safeguarding referral procedure states that a multi-agency referral should be made when the agency considers that: A child has been identified as a 'Child in Need' or is a Child in need of Protection', as detailed at level 4 in the threshold document: Dudley Threshold Guidance and Framework for Support 2018 www.dudleysafeguarding.gov.uk/professionals/thresholds-document/



Level 1 - No referral is required. Professionals should contact Dudley's Family Information Service on 01384 814398 to obtain information about support available for children, young people and families.

Level 2 - Partner agencies should complete their own internal assessment as appropriate and forward this to the relevant Family Centre. Alternatively, an Early Help Assessment can be completed and forwarded to the appropriate Family Centre Cluster.

Level 3 - Referrals should be made by completing an Early Help Assessment and forwarding it to the appropriate Family Centre Cluster.

Level 4 – Referral should be made. Dudley Safeguarding People's Partnership Board (DSPPB) Multi Agency Referral Form is available via <http://safeguarding.dudley.gov.uk/report-it/>

If you think the need has reached level 4 but require further advice or guidance, you can contact the MASH Team on: 0300 555 0050. Completed MARF must be emailed to: childrensMASH@dudley.gcsx.gov.uk

MASH is open Mon- Fri 9am to 5pm. If your referral is URGENT and is outside of these times or on a Bank holiday, please contact the Emergency Duty Team on: 0300 555 8574.

All telephone referrals must be followed up with completion of a MARF by the referrer within 24 hours.

Thresholds Framework – Accessing Services for Children in Dudley

Level 1 - Universal Services	Level 2 - Additional Support Single Agency, Early help	Level 3 - Complex Needs Multi Agency , Early Help	Level 4 - Acute Statutory/Specialist Intervention	
<p>Universal Provision E.g. Services Such as Schools and Youth Clubs.</p>	<p>Early help requires a multiagency response to avoid Social Care Intervention</p>		<p>Child In Need requiring intervention under Section 17 CA 1989</p>	<p>Section 47 Child Protection Child at risk of significant harm, Section 47 CA1989</p>
<p>Universal Services means that every child can access this provision. Staff and volunteers can work with the child to find the solution to a problem that has arisen. The agency/organisation may wish to contact another agency including the local family centre for information, advice and guidance.</p>	<p>If Early Help intervention is required an Early Help Assessment form, with consent of the child/parents needs to be completed. This should be filled in providing as much information as possible and then contact, via email, the Family Centre in the locality where the child lives. You will be asked to attend an Allocation Partnership Meeting,. You will stay involved and may be asked to be the Lead Professional.</p> <p>Family Centre Email address: Telephone No. F.s.brierleyhill@dudley.gov.uk 01384 813322 F.s.dudleycentral@dudley.gov.uk 01384 812440 F.s.dudleynorth@dudley.gov.uk 01384 813096 F.s.halesowen@dudley.gov.uk 01384 813954 F.s.stourbridge@dudley.gov.uk 01384 818780</p>		<p>If you are worried about a child you can telephone the MASH Team for advice and consultation on 0300 555 0050 9am - 5pm OR 0300 555 8574 after 5pm/weekends and Bank Holidays.</p> <p>You are worried that a Child needs a statutory social care assessment. If so complete a Multi Agency Referral Form (MARF) and email children's. Child/Parental consent is required.</p> <p>In circumstances a Child has committed an offence the child will need to be referred to Youth Offending Services number and email</p> <p>If the concern involves anyone working with children contact the LADO Officer</p> <p>If the concerns relate to CSE refer to the CSE Pathway</p>	
				

4.0 For all referrals regarding radicalisation:

Extremism and radicalisation is another part of safeguarding children and young people. As with any concern, the risk of harm and abuse is raised when young people are vulnerable and is often noticed when pupils change their behaviour, clothing or attitudes.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and which specific needs for which an extremist or terrorist group may appear to provide and answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system.

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour. The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

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

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour, staff should have confidence in their instincts and seek advice if something feels wrong. If staff are concerned about a pupil, they will follow our reporting procedures including discussing their concerns with the DSL. Staff should **always** act if they are worried.

If you have concerns about extremism

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

As with managing other safeguarding risks, staff should be alert to changes in children's behaviours which could indicate that they may be in need of help or protection. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to Dudley's Community Safety Partnership. The Wenlock School will only share information about children and families in a professional context.

In Dudley prevent work has been undertaken through the Dudley Prevent Delivery Group since 2007. For all Prevent referrals The Wenlock School will liaise with safe and sound (Dudley's Community Safety Partnership) – www.dudleysafeandsound.org/prevent

Outcomes First Group fully recognises its responsibility to have arrangements in place to safeguard and promote children from radicalisation. Section 26 of the Counter-Terrorism 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.

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 Designated Safeguarding Lead. Designated Safeguarding Leads 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 onto Sleuth.

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

CHANNEL

Individuals vulnerable to radicalisation can be referred into the "Channel" safeguarding process in order to prevent their being drawn into extremism. The Wenlock School follows procedures for



managing all safeguarding concerns in direct relation to vulnerable people at risk of becoming involved in extremist activity as set out in Dudley's overview of the Channel initiative.

Making a Referral to Dudley Prevent Team

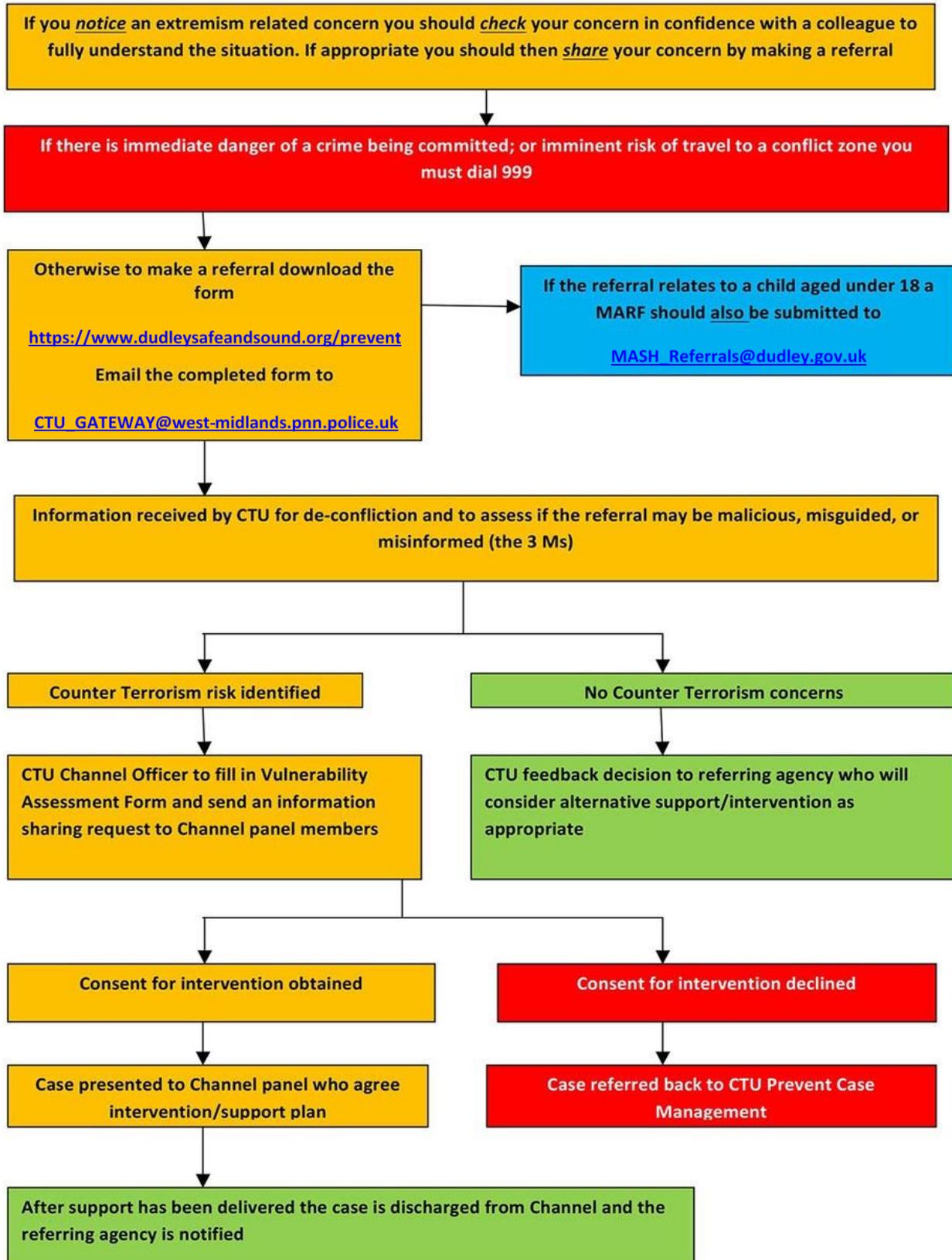
If concerns arise, a member of school staff will complete a Safeguarding Concern via SLEUTH to record and alert the School Prevent Lead. A referral is to be made to Dudley's Community Safety Partnership through safe and sound (<https://www.dudleysafeandsound.org/prevent>) if there are concerns that a pupil (or any other person) is at risk of getting involved in extremism or when an individual is identified as a cause for concern in relation to Prevent.

Once a referral is made the Prevent Team will investigate further to assess the nature and extent of the risk and develop the most appropriate support package for the individual concerned.

For more information on prevent in Dudley email sue.haywood@dudley.gov.uk or for referrals email CTU_GATEWAY@west-midlands.pnn.police.uk or if the referral relates to a child who is under 18 a MARF should also be submitted to MASH_Referrals@dudley.gov.uk

The below flowchart gives more information about the referral process for use by any member of staff concerned about any individual who they encounter:

DUDLEY PREVENT REFERRAL PROCESS



5.0 Definition of Child Sexual Exploitation (CSE):

'Sexual exploitation of a young person under 18 involves exploitative situations, contexts and relationships, where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, Alcohol, cigarettes, affection, gifts money) as a result of them performing, and/or another or others performing on them sexual activities. Child exploitation can occur through the use of technology without the Child's immediate recognition; for example, being persuaded to post sexual images on the internet/mobile phone without immediate payment or gain. In all cases, those exploiting the Child/Young Person will have more power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.'

Referral procedures:

Complete a CSE Screening tool from Dudley Local Authority. Where possible consent should be sought from parents and carers to complete the screening tool and share the information, unless to do so would place the child at increased risk. However, refusal of consent should not prevent the tool from being completed.

If the result of the screening tool is **low risk** then seek advice from professionals such as your school nurse, positive steps, sexual health outreach nurses (SHONS). Notify the CSE Team by email cse.team@dudley.gov.uk that you are aware of a low level risk case (include the child's name and DOB) that can be managed as a single agency or via a referral to Early Help. The CSE team will maintain a record for information and in case further referrals are received from other agencies.

If the screening tool identifies **medium** or **high** risk complete a MARF will be completed together with a detailed and quality copy of the completed screening tool to childrensmash@dudley.gcsx.gov.uk.

Once screened into MASH you will receive a response as follows:

Low risk – notice of decision and advice note to assist you in supporting the child in school or recommending a referral to Early Help.

Medium and High – notice of decision that the case has met threshold for statutory intervention. The child's social worker will be notified if already open to children's social care and allocated to the Assessment Team if not to initiate a Child/ Young Person's Assessment. If there is sufficient information to consider a section 47 a strategy meeting will be convened.

A Multi-agency Sexual Exploitation (MASE) will be arranged to take place within 5 working days for all medium and high cases, a representative from school will be required to attend. MASE meetings continue every 6 weeks until the child is stepped down to low risk or when they reach their 18th Birthday. For children in Dudley the average is 3- 4 MASE meetings.

- 5.1** The local authority procedure for an early help referral is Dudley Threshold of Need and Support Framework.
- 5.2** The Chair of Governors for The Wenlock School is Lauren Wright: 01204 558038
- 5.3** The OFG Group National Quality & Audit Officer for Safeguarding can be contacted on safeguarding@ofgl.co.uk

6. Safeguarding Training and Updates

- 6.1** This policy **must** be read in conjunction with Keeping Children Safe in Education (2020 and January 2021 updates). **All staff are expected to follow this policy and statutory guidance including KCSIE 2020 and January 2021 updates.**
- 6.2** This policy is written so as not to replicate information contained within KCSIE part 1 (2020 and January 2021 updates).
- 6.3** **All staff must read the following documents:**
- Part 1 of KCSIE (2020 and January 2021 updates)
 - The school's Restrictive Physical Intervention Policy
 - The school's Anti-bullying 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
 - 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 Designated Safeguarding Lead
 - The school's description and guidance of the role of the Deputy Designated Safeguarding Lead
 - 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
 - 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.
 - Designated Safeguarding Leads must refresh their advanced training at least every two years.
 - All members of school leadership teams, including the Head Teacher and designated safeguarding lead should also be familiar with Working Together to Safeguard Children 2018.

All of the above policies must be read as they link in with the Safeguarding policy.

7.0 Online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that

facilitates harm. An effective approach to online safety empowers a school to protect and educate the whole school or community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying;
- Disrespect nobody is Home Office advice and includes resources on healthy relationships, including sexting and pornography;
- Thinkuknow is the National Crime Agency/CEOPs education programme with age specific resources.

Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, governing bodies and proprietors will ensure each school has appropriate filters and monitoring systems in place.

8.0 Partnership working and sharing information

8.1 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.

8.2 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/carer's.

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

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

8.5 The GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on. *'The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of the children.'* (KCSIE 2020 and January 2021 updates).

8.6 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 (2020 and January 2021 updates) schools must hold more than one set of contact details for pupils.

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

9.0 Designated Safeguarding Lead

- 9.1** *'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. This should be explicit in the role-holder's job description.'* (KCSIE 2020 and January 2021 updates)
- 9.2** The Head Teacher must appoint one individual to be the lead Designated Safeguarding Lead, and make arrangements for there to be deputy Designated Safeguarding Leads in place who will manage any immediate safeguarding incidents in the Designated Safeguarding Lead's absence. The Designated Safeguarding Lead (and deputies) will receive DSL training every two years.
- 9.3** The Head Teacher must ensure that job descriptions for Designated Safeguarding Leads and Deputy Designated Safeguarding Leads are kept on personnel files and clearly state their responsibilities.
- 9.4** The DSL (or deputy) must always be available during school hours for staff to discuss any concerns. The DSL must be an appropriate senior member of the leadership team.
- 9.5** **The main responsibilities of the Designated Safeguarding Lead 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 Designated Safeguarding Lead is unavailable;
 - liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries;
 - adopt a child focused and holistic approach to deciding on further action;
 - refer allegations to the Local Authority Designated Officer;
 - 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 of any allegations or suspected harm having been caused to a child by a member of staff or employee of OFG group;
 - ensure that the school complies with LSCB procedures;
 - 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;
 - DSL's should work closely with senior Mental Health Leads;
 - DSLs should help promote educational outcomes by working closely with their teachers and sharing information about their welfare, safeguarding and child protection concerns;
 - promoting the educational achievements of Looked After Children in line with the Children and Social Work Act 2017.

- 9.6** It is important that all staff understand the role of the Designated Safeguarding Lead on their appointment within the school and as part of their induction. The Designated Safeguarding Lead is responsible for ensuring that all staff understand their roles and responsibilities regarding safeguarding children and that a child focused approach is taken. The Designated Safeguarding Lead will assess safeguarding concerns within the context of young people's environments. This is known as contextual safeguarding. The Designated Safeguarding Lead must ensure that clear, concise and good quality documents are kept of all allegations or safeguarding concerns. Data protection is not a barrier to record keeping or information sharing.
- 9.7** When young people move schools or move into further or higher education, the Designated Safeguarding Lead is responsible for ensuring that the necessary information is shared with the new school or college. It is the Designated Safeguarding Lead'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.**
- 9.8** Consideration must be given to sharing information verbally with the new school or college prior to the child or young person leaving. The Designated Safeguarding Lead 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 Designated Safeguarding Lead to ensure that a safe and satisfactory outcome has been reached and that all actions have been completed.

10.0 Roles and Responsibilities of Staff

- 10.1** Outcomes First Group recognises that it is not just one person's role to safeguard children but that it requires a collective response to safeguarding. All Outcomes First group employees must understand their roles and responsibilities regarding keeping children safe and reporting concerns.
- 10.2** During staff induction, staff will receive safeguarding training. Staff must be familiar and understand the role of the Designated Safeguarding Lead, the LSCB 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 2020, Part 1 and January 2021 updates.
- 10.3 Staff are responsible for:**
- compliance with Outcomes First Group policies, statutory guidance and legislation including Keeping Children Safe in Education (2020 and January 2021 updates) and Working Together to Safeguard Children (2018);
 - understanding the role of the Designated Safeguarding Lead;
 - 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 off line;
 - 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.

10.4 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 Designated Safeguarding Lead 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 Designated Safeguarding Lead to ensure that action has been taken.**

10.5 Early Help

'A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989' (KCSIE 2020 and January 2021 updates)

10.6 It is important that staff take swift and effective action to safeguard children and young people and to stop concerns from escalating. It may be that some children and young people will benefit from Early Help.

10.7 Staff must be aware and alert to the possibility of Early Help being needed for those children and young people who have particular vulnerabilities, such as those who:

- are disabled or who have specific additional needs;
- have special educational needs (whether or not they have a statutory education, health and care plan);
- are young carers;
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- are frequently missing/going missing from care or from home;
- are misusing drugs or alcohol themselves;
- are at risk of modern slavery, trafficking or exploitation;
- are in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- have returned home to their family from care;
- are showing early signs of abuse and/or neglect;

- are at risk of being radicalised or exploited;
- are a privately fostered child;
- are at risk of homelessness; the DSL (and deputies) will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures);
- where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

10.8 When a child or young person has been referred for Early Help, it is the responsibility of the Designated Safeguarding Lead to set up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration must be given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

10.9 Mental Health

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.

Positive mental health is the concern of the whole community and we recognise that schools play a key part in this. Our school wants to develop the emotional well-being and resilience of all pupils and staff. We understand that there are risk factors, which increase someone's vulnerability, and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to counter balance and promote further growth of resilience.

- Children with Mental Health issues

It is vital that we work in partnership with parents to support the well-being of our pupils. Parents should share any concerns about the well-being of their child with school, so appropriate support and intervention is identified and implemented. For further guidance please refer to Mental Health and Behaviours in School -

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

10.10 LGBT+ pupils

Some pupils may be vulnerable due to their sexual orientation or gender identity, either because they are subject to homophobic, bi-phobic or transphobic bullying or because of negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide or homelessness. Several studies evidence that LGBT+ young people may be at increased risk of becoming victims of CSE. Schools should therefore ensure that they are aware of the increased risk factors and access appropriate support for these young people when required.

11.0 Reporting concerns

11.1 What to do if a child or young person discloses

If a child or young person discloses information to a member of staff, they must ensure that they:

- listen to the child or young person;
- do not dismiss what the child or young person tells them. All concerns must be acted upon rigorously;
- do not promise to keep it a secret. They must explain that they have a duty to share information to keep them safe and protect them;
- write down what the child or young person tells them. This must be accurate and in the child's words;
- at no time should an individual teacher/member of staff consider taking photographic evidence of any injuries or marks to a child's person. This type of behaviour could lead to the staff member being taken into managing allegations procedures;
- immediately report the concerns to the Designated Safeguarding Lead or deputy. If neither is available, the member of staff must report the information to the Head Teacher or Regional Director for Education and Care;

11.2 Staff must be alert to not just potential familial abuse, but also to children and young people making allegations against staff, volunteers or peers.

11.3 All concerns, however small or trivial they may seem, **must** be immediately reported to the Designated Safeguarding Lead. This must be done verbally and then followed up **on the same day** and documented on the Sleuth system. The member of staff has a responsibility to ensure that action has been taken with regards to the concerns on the **following day** and that the concern is documented on Sleuth. If action is not taken in a timely way as the member of staff sees fit, they have a duty to escalate their concerns to the Head Teacher or the Regional Director for Education and Care. During school holidays all staff will have access to DSL's and deputy DSL's work mobile phone numbers so that they are contactable. In the event that a member of the safeguarding team is unavailable then all staff are to follow the procedure; **If a child is suffering or likely to suffer harm, or in immediate danger they must** make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral. Tell the DSL as soon as possible if you make a referral directly.

Dudley Report it page: <https://safeguarding.dudley.gov.uk/tell-us/>

11.4 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 Designated Safeguarding Lead or deputy, they must not share it with anyone else.

11.5 On receipt of the information, the Designated Safeguarding Lead must consider all information and then report this within **one working day** to the host authority, placing authority and where relevant the Local Authority Designated Officer.

12.0 Peer on Peer/Child on Child Abuse, Bullying, Sexual Violence and Sexual Harassment

12.1 KCSIE (2020 and January 2021 updates) states; ' ... abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up"'.

- 12.2** Staff must ensure that they create a school environment where children and young people's safety is paramount and where unacceptable or unsafe behaviour will not be tolerated. Staff must be aware and alert to incidents of on line abuse, sexting, sexual violence and sexual harassment between pupils and bullying. Staff must be alert to possible signs of peer on peer/child on child abuse. Inappropriate language must be rigorously and consistently challenged.
- 12.3** A contextual safeguarding approach must be taken when considering possible peer on peer/child on child abuse. Children and young people who display harmful behaviours must be seen as potential victims themselves, and the wider environmental risks must be taken into account. Staff must challenge any gender bias or derogatory language used by staff or pupils. Staff must not dismiss any concerns brought to them by pupils. Staff can report concerns verbally but they must ensure that all concerns are recorded onto Sleuth by the end of the school day.
- 12.4 **Staff must act immediately and report any concerns regarding peer on peer/child on child abuse to the Designated Safeguarding Lead.****
- 12.5** When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour. Schools must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.
- 12.6 **What to do if there are concerns:****
Designated Safeguarding Leads must deal with any concerns of peer on peer/child on child 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.
- 12.7** 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.
- 12.8** Where the Designated Safeguarding Lead 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.
- 12.9** If the local authority does not believe it meets their threshold for further action and the Designated Safeguarding Lead is not in agreement, this must be challenged with the local authority.
- 12.10 **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/child on child abuse;
 - support for the victim must be offered and provided where possible. If necessary, 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 Designated Safeguarding Lead must complete an investigation into the incident; The investigation must consider the occurrence of 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 to be completed and implemented for the young person who has displayed harmful behaviours in order to safeguard them and other pupils.

12.11 Bullying

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'; it can even be encouraged and rewarded.

12.12 Outcomes First Group has a zero tolerance approach to bullying.

All staff have a responsibility to challenge bullying even at a low level. 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 Designated Safeguarding Lead **on the same day**. The concerns must be documented on Sleuth.

12.13 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.

12.14 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' December 2017.

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

12.16 Preventative Strategies

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. PSHE 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.

12.17 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.

12.18 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 Designated Safeguarding Lead.

12.19 Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. They can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. All staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

12.20 Upskirting Under the Voyeurism (Offences) Act came into force on 12 April 2019

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

12.21 Staff must not dismiss any concerns that is reported from a child. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. **Staff must act immediately and report any concerns regarding sexual violence and sexual harassment to the Designated Safeguarding Lead.**

12.22 For further information, refer to Part 5 of Keeping Children Safe in Education (2020 and January 2021 updates) 'Child on Child Sexual Violence and Sexual Harassment'. Advice is available here: <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>. For further information, please refer to Harmful Sexual Behaviours policy.

13. Children Missing in Education

13.1 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. Children and young people's attendance must be monitored through Senior Leadership Team Meetings and Governance.

- 13.2** The Head Teacher must ensure that there are two contact numbers on a pupil's file. The Designated Safeguarding Lead 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 Designated Safeguarding Lead. The Designated Safeguarding Lead must make contact with the child or young person's parent/carer immediately to establish the child or young person's whereabouts. The Designated Safeguarding Lead must inform the placing authority of a pupil's poor attendance.
- 13.3** The Designated Safeguarding Lead 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 Designated Safeguarding Lead **must** refer any safeguarding concerns regarding the absence of a pupil to the local authority. In cases where there are immediate concerns regarding forced marriage or FGM, the Designated Safeguarding Lead must refer to the police immediately. All information **must** be documented on Sleuth.
- 13.4** 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 Designated Safeguarding Lead must share this information with the police.

14. Exploitation

- 14.1** Exploitation of children and young people is a form of child abuse and can include sexual exploitation or criminal exploitation. Schools must write and implement a local exploitation procedure which staff must be familiar with.
- 14.2** All staff **must** know the definitions, signs and indicators of CSE and County Lines. Designated Safeguarding Leads must provide ongoing training and learning to staff around exploitation. All staff **must** have training in exploitation.
- 14.3** All staff **must** read Outcomes First Group's Exploitation policy as well as refer to Keeping Children Safe in Education (2020 and January 2021 updates).
- 14.4** Staff **must** report concerns regarding exploitation **immediately** to the Designated Safeguarding Lead. Staff must document their concerns on Sleuth **on the same day**. Where there are immediate concerns relating to children and young people's safety due to exploitation, Designated Safeguarding Leads 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.
- 14.5** Where there are low level concerns, Designated Safeguarding Leads must document the concerns on a chronology in order to establish a full picture of what is happening for the child or young person.
- 14.6** 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 are concerned about child exploitation.

14.7 Female Genital Mutilation

In line with KCSIE (2020 and January 2021 updates), 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'. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

14.8 Staff must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet' as outlined within KCSIE 2020 page 88 and January 2021 updates.

14.9 Teaching staff have a legal duty to share concerns with the Designated Safeguarding Lead and to report any concerns. In suspected cases of FGM, staff must refer to the local authority as well as the police. The Designated Safeguarding Lead will assist and support staff with this.

14.10 The Designated Safeguarding Lead must ensure that immediate concerns regarding potential abuse, harm, honour based violence including FGM, forced marriage and breast ironing, CSE and Trafficking or Radicalisation are shared **immediately** with the relevant Regional Director for Education and Care (chair of governors) and that staff have documented them onto Sleuth.

15. Physical Interventions

15.1 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.

15.2 All staff must read and know the school's individual Physical Intervention Policy.

15.3 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 record onto Sleuth. Staff must also verbally inform the Designated Safeguarding Lead/deputy as well as recording it onto Sleuth. **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 of Education and Care, safeguarding@ofgl.co.uk and the Local Authority Designated Officer.

16. Allegations against Staff

16.1 Keeping Children Safe in Education (2020 and January 2021 updates) considers an allegation to be 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.

- 16.2** 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 Designated Safeguarding Lead.
- 16.3** Part four of Keeping Children Safe in Education (2020 and January 2021 updates) 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 (2020 and January 2021 updates) 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 Local Authority Designated Officer (LADO) to determine a suitable outcome. Governing bodies should discuss with the agency whether it is appropriate to suspend the supply teacher or redeploy them to another part of the school whilst they carry out their investigation.'
- 16.4** 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 Sleuth. The member of staff must immediately report the allegation to the Designated Safeguarding Lead or deputy. The Designated Safeguarding Lead has a responsibility to take all allegations seriously regardless of whether a child or young person has made previous allegations. The Designated Safeguarding Officer may wish to speak with the LADO and seek advice about next steps on the same day. Allegations must be reported to the Local Authority Designated Officer within one working day. The Designated Safeguarding Lead must ensure that they follow the Outcomes First Group's Managing Allegations Procedure. The Local Authority Designated Officer/Designated Officer is Yvonne Nelson-Brown: 01384 813110 mob: 07811991432 email: YvonneNelson-Brown@dudley.gov.uk
- 16.5** 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 LADO.
- 16.6** **All allegations made against staff must be reported to the Regional Director for Education and Care and HR and the group Head of Safeguarding via safeguarding@ofgl.co.uk . Outcomes First Group recognises that managing allegations can be challenging and so will support with the process.**
- 16.7** It is the responsibility of the Designated Safeguarding Lead to ensure that all allegations are managed in line with local safeguarding partnership procedures.

17. Working with the Local Authority Designated Officer

- 17.1** In all referrals, the Designated Safeguarding Lead is the lead professional within the school for ensuring that a timely response is received from the local authority or LADO. If a response is received which the Designated Safeguarding Lead 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.

18. Whistleblowing

- 18.1** 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. Outcomes First 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.
- 18.2** 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. Designated Safeguarding Leads and Head Teachers have a responsibility to ensure that they create an environment where staff feel safe to openly voice any concerns and that they feel listened to. It is also important that staff feel supported if concerns are raised about them. If staff see or heard 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.
- 18.3** 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.
- 18.4** Staff can call Safecall on **08009151571**, report online **www.safecall.co.uk/reports**, or email **outcomesfirstgroup@safecall.co.uk**

19. The role of Senior Manager and Governor

- 19.1** Like teaching staff and volunteers, senior managers and Governors must be safely recruited and have all relevant checks on file. Please see the Safer Recruitment policy for further information.
- 19.2** Governors must have oversight of safeguarding policies and procedures that they are being effectively implemented within the school and that training is effective. In line with KCSIE (2020 and January 2021 updates), 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 Lauren Wright: 01204 558038.
- 19.3** It is the Governors' responsibility to ensure that there is a named Designated Safeguarding Lead and that the school contributes to multi-agency working in line with Working Together to Safeguard Children (2018). Governance is held termly where Safeguarding is at the top of each agenda.

20.0 Safer Recruitment

- 20.1** The Outcomes First Group Safer Recruitment Policy sets the processes which must be followed for the recruitment of staff and volunteers.

- 20.2** It is the responsibility of the Head Teacher to ensure that the Single Central Record is compliant with legislation and statutory guidance and kept up to date and is stored confidentially.
- 20.3 Managing Referrals to Disclosure and Barring Service, Health & Care Professions Council, 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.**
- 20.4** 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.
- 20.5** Outcomes First Group managers must notify the Safeguarding Sub-Committee of all possible referrals to the Disclosure and Barring Service or any relevant professional body in the UK.
- 20.6** 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.
- 20.7** The Safeguarding Sub-Committee will support the decision-making process to refer an employee to a professional body / 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.

Author	Louise Herson
Document Title	Safeguarding and Child Protection
Date Reviewed	August 2020 (Updated January 2021)
Next OFG Review Date	August 2021

Appendix 1: Covid-19 Safeguarding Practice Guidance for Educational Settings

Key Safeguarding Messages to Parents and Pupils (Carolyn Eyre NASS, 22.03.20)

- Discuss with parents the impact of closure on their ability to work and their mental health ;
- Check if all parents have internet access and make alternative resource and information sharing arrangements for those who do not ;
- Share information about Early Help, Samaritans, Mind, Domestic abuse helplines and other support services that can help - the Safeguarding Hub includes links to almost every safeguarding service / organisation in England <https://www.safeguardingresourcehub.co.uk>;
- For pupils living in the same area as the school, provide parents with contact details for the local early help / children's social care services ;
- It is likely that children will spend more time online; re-share online safety advice and resources such as Thinkuknow, Safer Internet Centre and Digital Parenting ;
- Provide all parents with the Thinkuknow parent guide relevant to the age / developmental stage of their child/ren ;
- If not already done so, add a link to ParentInfo to your website – this DfE backed website provides parents with up to date information about a range of topics <https://parentinfo.org>;
- Children and young people are hearing about the Coronavirus too, or may be picking up changes in mood / behaviour / routines around them, and may be feeling scared and anxious. Talking to children about their worries can help; Child Mind Institute, Beacon House, Young Minds, Special Needs Jungle have resources that can support you and can be shared with parents. Victoria Education Centre has shared a couple of social stories on COVID-19 online (embedded below) ;
- Ensure all contact details are up to date for staff, governors/ trustees, children and families'.

Appendix 2: Signs of Abuse

Physical Signs	Changes in Behaviour
Physical Abuse	
<ul style="list-style-type: none"> • unexplained bruising, marks or injuries on any part of the body • multiple bruises- in clusters, often on the upper arm, outside of the thigh • cigarette burns • human bite marks • broken bones • scalds, with upward splash marks, • multiple burns with a clearly demarcated edge 	<ul style="list-style-type: none"> • fear of parents being approached for an explanation • aggressive behaviour or severe temper outbursts • flinching when approached or touched • reluctance to get changed, for example in hot weather • depression • withdrawn behaviour • running away from home
Emotional	
<ul style="list-style-type: none"> • Speech disorders • Delayed physical development • Substance abuse • Ulcers, severe allergies • Failure to thrive • Self-harm 	<ul style="list-style-type: none"> • neurotic behaviour e.g. sulking, hair twisting, rocking • being unable to play • fear of making mistakes • sudden speech disorders • self-harm • fear of parent being approached regarding their behaviour • developmental delay in terms of emotional progress
Sexual	
<ul style="list-style-type: none"> • pain or itching in the genital area • bruising or bleeding near genital area • sexually transmitted disease • vaginal discharge or infection • stomach pains • discomfort when walking or sitting 	<ul style="list-style-type: none"> • sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn • fear of being left with a specific person or group of people • having nightmares • running away from home • sexual knowledge which is beyond their age, or developmental level

<p>down</p> <ul style="list-style-type: none"> • pregnancy 	<ul style="list-style-type: none"> • sexual drawings or language • bedwetting • eating problems such as overeating or anorexia • self-harm or mutilation, sometimes leading to suicide attempts • saying they have secrets they cannot tell anyone about • substance or drug abuse • suddenly having unexplained sources of money • not allowed to have friends (particularly in adolescence) • acting in a sexually explicit way towards adults
Neglect	
<ul style="list-style-type: none"> • constant hunger, sometimes stealing food from other children • constantly dirty or 'smelly' • loss of weight, or being constantly underweight • inappropriate clothing for the conditions 	<ul style="list-style-type: none"> • complaining of being tired all the time • not requesting medical assistance and/or failing to attend appointments • having few friends • mentioning being left alone or unsupervised