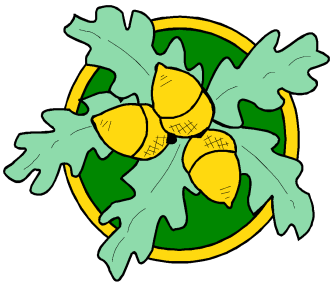
LEARNING OPPORTUNITIES

Safeguarding Policy and Procedures

Incorporating Child Protection



September 2021

This core policy forms part of the induction for all staff.

It is a requirement that all members of staff have access to this policy and sign to say they have read its contents. Their understanding and compliance will be monitored on a regular basis.

Previous Review Date – August 2021

Next review date – August 2022

The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.

Learning Opportunities

Role	Name	Contact
Designated Safeguarding Lead	Simon Graydon Headteacher	simong@learningopps.org 01304 381906 / 07394 984289 / 01304 371527
Designated Safeguarding Lead	Catherine Graydon	catherineg@learningopps.org 01304 381906 / 07394 984289 / 01304 371527
Designated Safeguarding Lead	Heather Tulett	heathert@learningopps.org 01304 381906 / 01304 371527

INFORM YOUR DESIGNATED SAFEGUARDING LEADS		
Simon	Heather	Catherine
 simong@learningopps.org	 heathert@learningopps.org	 catherineg@learningopps.

Education Safeguarding Service Contacts

Head Office: Room 2.30 Sessions House, County Hall, Maidstone ME14 1XQ	
Claire Ray Head of Service	03000 415788
Training & Development Manager Rebecca Avery	03000 418707
Online Safety	03000 415797
For advice on safeguarding issues please call your area office on the numbers listed below. If a child may be at risk of imminent harm you should call the Integrated Front Door on 03000 411111 or the Police on 999	
Ashford	03000 415648
Canterbury	03000 418503
Dartford	03000 412445
Dover	03000 415648
Folkestone & Hythe	03000 415648
Gravesham	03000 412445
Maidstone	03000 412284
Sevenoaks	03000 412445
Swale	03000 418503
Thanet	03000 418503
Tonbridge & Malling	03000 412284
Tunbridge Wells	03000 412284

Kent County Council Key Contacts

Integrated Front Door: **03000 411111** (outside office hours **03000 419191)**
Early Help Contacts (district teams) can be found on www.kelsi.org.uk

LADO Team contact number: 03000 410888 **If your call is urgent i.e. a child is in immediate danger and you cannot be connected to the team you should call the Integrated Front Door on** **03000 41 11 11** **Email: kentchildrenslado@kent.gov.uk**
Kroner House, Eurogate Business Park, Ashford, Kent, TN24 8XU

Area Education Officers
South Kent – Celia Buxton 03000 421415
East Kent – Marisa White 03000 418794
West Kent – Nick Abrahams 03000 410058
North Kent – Ian Watts 03000 414302

Prevent Education Officers
North/West/ Medway - Sally Green sally.green2@kent.gov.uk 03000 413439
South/East - Jill Allen jill.allen@kent.gov.uk 03000 413565

Kent Safeguarding Children Multi-Agency Partnership (KSCMP) kscmp@kent.gov.uk

	03000 421126

National Support

NSPCC	**0808 800 5000**	**www.nspcc.org.uk**
Police	**In an emergency** **Non emergency**	**999** **101**

REMEMBER – IF YOU HAVE ANY CONCERNS – ACT

Staff who have concerns about the safety or welfare of a student and / or feel that these concerns are not being acted upon by the DSLs can make direct contact with Kent Central Duty Team:

Telephone: 03000 411111

Emergency Out of Hours Telephone: 03000 419191

Online Referral Form: https://kccchildrens.kent.gov.uk/web/portal/pages/home

Guidance on thresholds for support can be found here - https://www.kelsi.org.uk/__data/assets/pdf_file/0010/86464/Support-Levels-Guidance-Sheet.pdf

Email: CentralDutyTeam@kent.gcsx.gov.uk

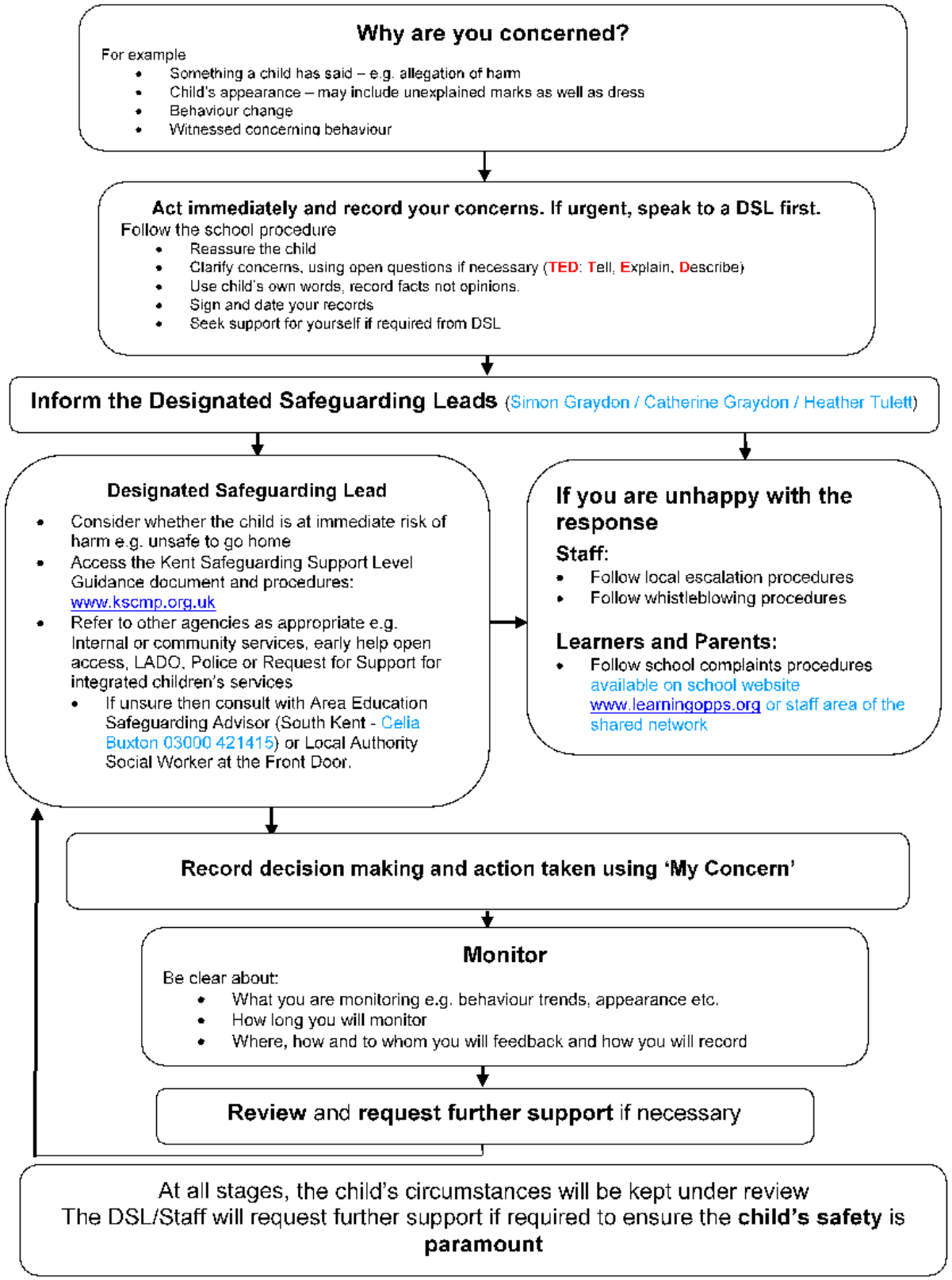
If you feel a child is in immediate danger, call 999.

If the concerns are about the Head Teacher, then the Proprietor should be contacted.

NAME: Lesley Buss (Proprietor) lesleyb@learningopps.org Tel: 07860 139678

If the concerns about the Proprietor, then contact the LADO Tel: 03000 41 08 88

What to do if you have a welfare concern in Learning Opportunities



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1 INTRODUCTION

1.1. Learning Opportunities recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding children is everyone's responsibility. Everyone who comes into contact with children and families are an important part of the wider safeguarding system for students and have an essential role to play in making our community safe and secure.

1.2. Our students' welfare is our paramount concern. Learning Opportunities believe that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.

1.3. Staff working with students at Learning Opportunities will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a student, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act immediately.

1.4. Learning Opportunities recognises the importance of providing an ethos and environment within school that will help students to be safe and to feel safe. In our school, students are respected and are encouraged to talk openly. We will ensure their wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide. We will work together with agencies to ensure that our school has adequate arrangements to identify, assess and support those children who are suffering or likely to suffer harm.

1.5. Our core principles are:
Prevention – positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
Protection - following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
Support - for all students, parents / carers and staff, and where appropriate specific interventions are provided for those who may be at risk of harm.
Working with parents / carers and other agencies - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

1.7. This policy is in keeping with relevant national procedures and reflects what we consider to be safe and professional practice in this context. The procedures apply to all staff, including agency staff, and are consistent with those outlined within KCSIE 2021.

2 POLICY CONTEXT

2.1 In line with the law, this policy defines a child as anyone under the age of 18 years but in the case of SEN it is up to 25 years of age.

2.2 This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2021 (KCSIE) which requires individual schools to have an effective child protection policy.

2.3 This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
Keeping Children Safe in Education 2021 (KCSIE)
Working Together to Safeguard Children 2018 (WTSC)
Ofsted: Education Inspection Framework' 2021
Framework for the Assessment of Children in Need and their Families 2000
Kent and Medway Safeguarding Children Procedures
The Education Act 2002
The Education (Independent School Standards) Regulations 2014

2.4 Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

2.5 **COVID**

Learning Opportunities is currently operating in response to coronavirus (Covid-19), however, our safeguarding principles, remain the same. We will continue to follow government guidance and will amend this policy and our approaches, as necessary.

We acknowledge that as a result of the Covid-19 pandemic some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

3 DEFINITION OF SAFEGUARDING

3.1 In line with KCSIE 2021, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

3.2 Learning Opportunities acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Children with family members in prison
- Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs

- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or "Sexting"
- Online safety
- Peer on peer abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- Upskirting

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2021)

4 RELATED SAFEGUARDING POLICIES

4.1 This policy is one of a series in the school integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:

- Behaviour management and use of physical intervention
- Staff Code of conduct/AUP
- Online safety
- Anti-bullying
- Data protection and information sharing
- Image use
- Relationship and Sex Education (RSE)
- Health and safety
- Attendance
- Risk assessments
- First aid and accidents
- Managing allegations against staff
- Safer recruitment
- Whistleblowing

5 POLICY COMPLIANCE, MONITORING & REVIEW

5.1 We will ensure that systems are in place to monitor the implementation of, and compliance with, this policy and accompanying procedures.

5.2 We will complete an audit of the school's safeguarding arrangements annually.

5.3 The school's senior leadership team will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

5.4 Learning Opportunities will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures. All other linked policies will be reviewed in line with the policy review cycle.

5.5 The Designated Safeguarding Lead will ensure that staff members, including agency staff are made aware of any amendments to policies and procedures.

5.6 All staff, including agency staff, will be able to access a copy of this policy and Part One of KCSIE 2021 on staff shared area of the school system. Copies are also located in KS4 Office, KS3 staff planning area and available on the school website (www.learningopps.org).

5.7 Parents/carers can obtain a copy of the school Safeguarding / Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website: www.learningopps.org

5.8 The policy forms part of our school learning improvement plan and will be reviewed annually by the proprietor/senior leadership team who has responsibility for oversight of safeguarding and child protection systems.

5.9 The Designated Safeguarding Leads will ensure regular reporting on safeguarding activity and systems to the proprietor.

6 ROLES & RESPONSIBILITIES

6.1 Governance & Leadership

The proprietor and senior leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.

The proprietor has regard to the KCSIE 2021 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.

The proprietor will support the DSLs and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

The proprietor will ensure that the DSLs are supported in their role and are provided with sufficient time so they can provide appropriate support to staff and students regarding any safeguarding and welfare concerns.

The headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the proprietor, are understood, and followed by all staff.

6.2 Designated Safeguarding Leads (DSLs)

Learning Opportunities has appointed (Simon Graydon - Headteacher), a member of the Senior

Leadership team, as the senior Designated Safeguarding Lead (DSL). He is supported by two additional DSLs who are both members of the senior leadership team (Catherine Graydon & Heather Tulett).

The senior DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) within the school. Whilst the activities of the DSL may be delegated to other DSLs, the ultimate lead responsibility for safeguarding and child protection remains with the senior and this responsibility will not be delegated.

It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2021. This includes but is not limited to:

- Acting as the central contact point for all staff to discuss any safeguarding concerns
- Maintaining a confidential recording system for safeguarding and child protection concerns
- Co-ordinating safeguarding action for individual children
- When supporting children with a social worker or looked after children the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
- Liaising with other agencies and professionals in line with KCSIE 2021 and WTSC 2018
- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed, as necessary.
- Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
- Managing and monitoring the school role in any multi-agency plan for a child.
- Being available during term time for staff in the school to discuss any safeguarding concerns.
- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- Informing the proprietor of any significant safeguarding issues.

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

6.3 Staff

All members of staff have a responsibility to:

- Provide a safe environment in which students can learn.
- Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.

- Know what to do if a student tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have.
- Be able to identify and act upon indicators that students are, or at risk of developing mental health issues.
- Be prepared to identify students who may benefit from early help.
- Understand the early help process and their role in it.
- Understand the school safeguarding policies and systems.
- Undertake regular and appropriate training which is regularly updated.
- Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Know how to maintain an appropriate level of confidentiality - information should only be shared with DSLs who will decide who else 'needs to know'.
- Reassure students who report concerns that they are being taken seriously and that they will be supported and kept safe.

6.4 Students

Students have a right to:

- Feel safe, be listened to, and have their wishes and feelings taken into account.
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Contribute to the development of school safeguarding policies as appropriate.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

6.5 Parents & Carers

Parents & carers have a responsibility to:

- Understand and adhere the relevant school policies and procedures.
- Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online.
- Seek help and support from the school or other agencies.

7 CHILD PROTECTION PROCEDURES

7.1 Recognising Indicators of Abuse and Neglect

All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2021. This is outlined locally within the Kent Support Levels Guidance.

Learning Opportunities recognise that when assessing whether a student may be suffering actual or potential harm there are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Learning Opportunities recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary

from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

Learning Opportunities recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

Parental / carer behaviours can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

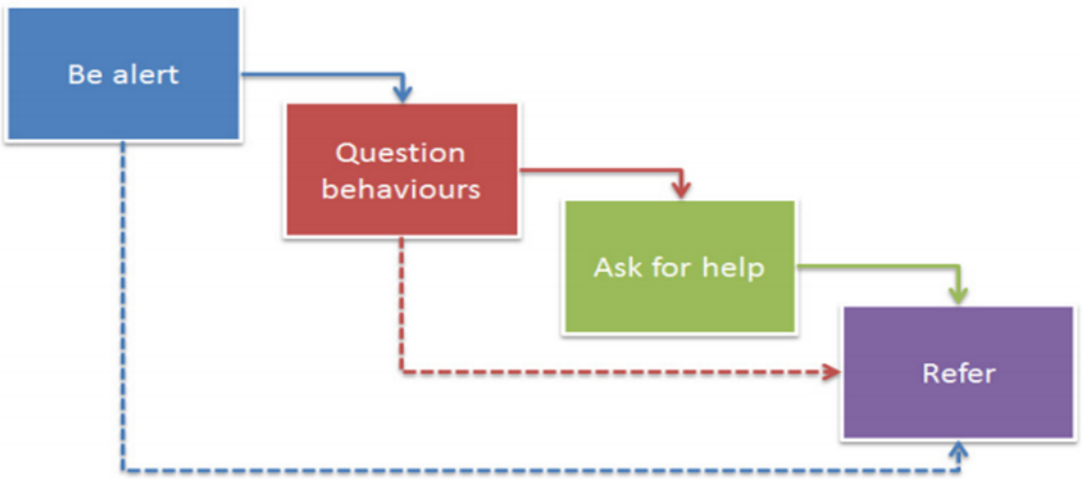
Students may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

Safeguarding incidents and/or behaviours can be associated with factors and risks outside the School. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.

By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.

All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



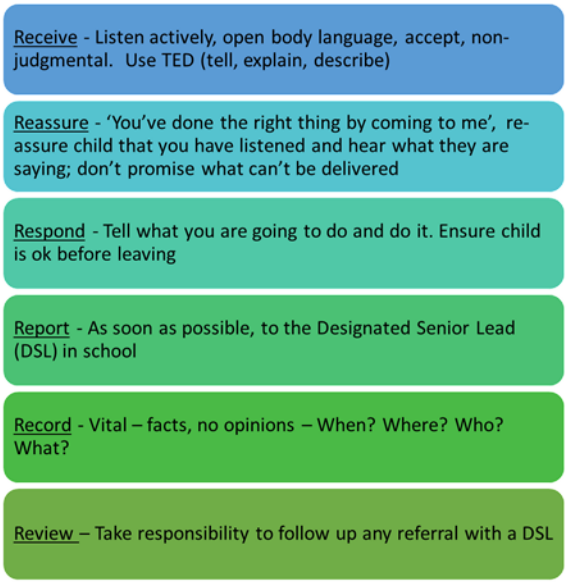
In all cases, if staff are unsure, they will always speak to a DSL.

Learning Opportunities recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

7.2 Responding to Child Protection Concerns

If staff are made aware of a child protection concern, they are expected to:

- listen carefully to the concern and be non-judgmental.
- only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
- not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
- be clear about boundaries and how the report will be progressed.
- record the concern in line with school record keeping requirements.
- inform the DSL as soon as practically possible.



A DSL should always be available to discuss safeguarding concerns either in person or on the phone. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.

Learning Opportunities will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).

- The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk
- Specific information and guidance to follow with regards to accessing Early Help and Preventative Services and/or Children's Social Work Services as part of Integrated

Children's Services (ICS) in Kent can be found here: www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services

Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, a 'request for support' will be made immediately to Integrated Children's Services (https://kccchildrens.kent.gov.uk/web/portal/pages/home) and/or the police, in line with KSCMP procedures.

Learning Opportunities recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.

- The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
- They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).

In the event of a request for support being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.

All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.

Where is it is identified a child may benefit from Early Help support (as provided by ICS) , the DSL will generally lead as appropriate and make a request for support via the Front Door.

- The DSL will keep all early help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse.

If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving or there is a concern regarding decisions made, the DSL will consider following KSCMP escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.

Learning Opportunities is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

7.3 Recording Concerns

All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded on https://www.myconcern.co.uk without delay.

Records will be completed as soon as possible after the incident/event, using the child's words. Child protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.

If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.

If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL directly, not with other staff..

Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.

All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school/college, under confidential and separate cover as soon as possible. Or electronically via 'My Concern'.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.

Where the school receives child protection files, the DSL will ensure key staff will be made aware of relevant information as required.

7.4 Multi-agency Working

Learning Opportunities recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings. We will ensure that we have a clear process for gathering the evidence required for reviews and audits, embed recommendations into practice and compile required actions within agreed timescales.

7.5 Confidentiality & Information Sharing

Learning Opportunities recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2021.

Learning Opportunities has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is complaint with all matters relating to confidentiality and information sharing requirements. The proprietor (Lesley Buss) is the schools DPO.

The Data Protection Act 2018 and GDPR do not prevent 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 safeguard and promote the welfare and protect the safety of children (KCSIE 2021). DfE ''Information sharing advice for safeguarding practitioners'' (2018) provides further detail, and can be accessed via shared area on staff network.

All staff members will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.

Staff will understand their responsibilities, including how to obtain consent to share information and when information can be shared without consent. If in any doubt about sharing information, staff should speak to the designated safeguarding lead.

The headteacher and DSL will disclose relevant safeguarding information about students with staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.

7.6 Whistleblowing & Complaints

We recognise that students cannot be expected to raise concerns in an environment where staff members fail to do so.

All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents / carers, students and members of staff and visitors who wish to report concerns or complaints. This can be found shared area on staff network and on the school website www.learningopps.org

Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk

Learning Opportunities Whistle Blowing policy is located on our website www.learningopps.org
Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.

- Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

The senior leadership team at Learning Opportunities will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.

Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 12 of this policy.

8 SPECIFIC SAFEGUARDING ISSUES

Learning Opportunities is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read annex B of KCSIE 2021 which contains important additional information

about specific forms of abuse and safeguarding issues.

Where staff are unsure how to respond to specific safeguarding issues, they should speak with the DSL or a deputy.

8.1 Peer-on-Peer Abuse

All members of staff at Learning Opportunities recognise that children are capable of abusing their peers, and that it can happen both inside and outside of school and online.

Learning Opportunities recognises that peer on peer abuse can take many forms, including but not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals

Learning Opportunities believes that abuse is abuse and it will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Learning Opportunities recognises that even if there are no reported cases of peer on peer abuse, such abuse is still likely to be taking place.

All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that that some peer on peer abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

Concerns about student's behaviour, including peer on peer abuse taking place offsite will be responded to as part of a partnership approach with students and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-
bullying, acceptable use, behaviour and child protection policies.

In order to minimise the risk of peer-on-peer abuse, Learning Opportunities will:

- implement a robust anti-bullying policy
- provide an age/ability appropriate PSHE and RSE curriculum
- provide a range of reporting mechanisms

Learning Opportunities want students to feel able to confidently report abuse and know their concerns
will be treated seriously. All allegations of peer on peer abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child

protection, anti-bullying and behaviour. Students who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Alleged victims, perpetrators and any other child affected by peer on peer abuse will:

- feel confident that reports will be taken seriously
- be carefully listened to and that staff will avoid victim blaming
- be provided with appropriate pastoral support

Learning Opportunities will work with parents/carers, review educational approaches as appropriate, follow procedures as identified in other policies e.g. the school anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS.

8.2 Child on Child Sexual Violence or Harassment – (refer to Annexe B)

When responding to concerns relating to child on child sexual violence or harassment, Learning Opportunities will follow the guidance outlined in Part Five of KCSIE 2021 and the DfE 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges' 2021 guidance - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf.

Learning Opportunities recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap, and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

We recognise that students who identify as LGBTQQIP2SAA (lesbian, gay, bisexual, transgender, questioning, queer, intersex, pansexual, two-spirit (2S), androgynous and asexual) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBTQQIP2SAA (whether they are or not) can be just as vulnerable as children who identify as LGBTQQIP2SAA .

Children who are victims and survivors of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. We will ensure that victims and survivors are protected, offered appropriate support and every effort is made to ensure their education is not disrupted.

All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report. Other children and school staff will be supported and protected as appropriate.

Our approach to sexual violence and sexual harassment reflects and is part of our broader approach to safeguarding. All staff, students and parents / carers 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";
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and

- understanding that all of the above can be driven by wider societal factors beyond the school, such as everyday sexist stereotypes and everyday sexist language.

When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children and staff and any actions that are required to protect them.

Reports will initially be managed internally by the school/college and where necessary will be referred to Integrated Children's Services and/or the Police.

- The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, or school staff, and, any other related issues or wider context.

If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

The DSL will ensure that accurate records of all incidents of sexual violence and harassment are logged on My Concern and reported to the proprietor as part of the fortnightly safeguarding meetings. This data will be analysed by the DSL who will assess the effectiveness of support and re-design further strategies to improve procedures if necessary.

8.3 Nude and/or Semi-Nude Image Sharing by Children

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

The UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing, and should be read and understood by DSLs working will all age groups.

Learning Opportunities recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL.

When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:

- Report any concerns to the DSL immediately.

- Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
- Not delete the imagery or ask the child to delete it.
- Not say or do anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: Sharing nudes and semi-
nudes: advice for education settings working with children and young people' and the local KSCMP guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
- parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- All decisions and action taken will be recorded in line with our child protection procedures.
- a referral will be made to ICS and/or the police immediately if:
  the incident involves an adult (over 18).
  there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
  the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
  a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

8.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Learning Opportunities recognises that CSE and CCE are forms of abuse that occur where 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 the
financial advantage or increased status of the perpetrator or facilitator and/or through violence or the
threat of violence. 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.

If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

8.5 Serious Violence

All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, 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.

Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.

- The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

8.6 So-called honour based abuse

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

All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy).

Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

- 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.

8.7 Preventing radicalisation

Learning Opportunities is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

Learning Opportunities recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Staff will report any concerns to the DSL, who is aware of the local procedures to follow. Further guidance and a referral form is available here - https://www.kscmp.org.uk/procedures/prevent

8.8 Cybercrime

Learning Opportunities recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be

committed only by using a computer/internet enabled device) cybercrime.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime,
the DSL will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general
online safety, they will be responded to in line with this and other appropriate policies.

9 SUPPORTING STUDENTS POTENTIALLY at GREATER RISK of HARM

We recognise that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and some sense of blame. Learning Opportunities may be the only stable, secure and predictable element
in their lives.

We will support all students by:

- providing a range of appropriate adults to approach if they are in difficulties; and ensuring that they are taught how to 'recognise when they are at risk and how to get help when they need it'.

- providing opportunities to support their development in ways that will foster security, confidence and independence and encourage the development of self-esteem and self-assertiveness while not condoning aggression or bullying; (The anti-bullying policy is located on our website. www.learningopps.org

- ensuring that the curriculum will help children stay safe, recognise when they do not feel safe and identify who they might or can talk to. It will support young people to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that children may be coerced into including 'sexting' and 'Harmful Sexualised Behaviour';

- ensuring repeated hate incidents, e.g. racist, homophobic or gender- or disability-based bullying, are considered under Safeguarding procedures and monitoring children who have been identified as having welfare or protection concerns and providing appropriate support;

- liaising where appropriate with a range of agencies such as Health Services, Child and Adolescent Mental Health Services, Education Welfare Services, Special Educational Support Services, Youth Services and the Educational Psychology Service.

Whilst all children should be protected, some groups of children are potentially at greater risk of harm.

9.1 Safeguarding Children with Special Educational Needs or Disabilities (SEND)

Learning Opportunities acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.

Children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.

All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

Members of staff are encouraged to be aware that children with SEND can be disproportionally impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.

9.2 Children Requiring Mental Health Support

All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education.

Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL.

Additional information and links can be found in part Two, KCSIE 2021.

9.3 Children Missing from Education

Children missing from education, defined as '*children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school*', (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf) particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.

Where the school have concerns that a child is missing from education, we will respond in line with our statutory duties and local policies.

9.4 Elective Home Education.

Where a parent/carer expresses their intention to remove a child from school with a view to educating

at home, we will respond in line with national Elective Home Education guidance and local Kent guidance and will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child. Further information is available here - https://www.gov.uk/government/publications/elective-home-education

9.5 Children who need a Social Worker

The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

9.6 Looked after children, previously looked after children and care leavers

Learning Opportunities recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.

The Headteacher acts as the 'designated teacher' and works with local authorities to promote the educational achievement of registered students who are looked after or who have been previously looked after.

The designated teacher will work with the DSLs to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.

Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.

Where the school believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the front door.

Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

10 ONLINE SAFETY (Refer to Learning Opportunities Online Safety Policy)

It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Learning Opportunities will adopt a whole school approach to online safety which will empower, protect, and educate our students and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Learning Opportunities will ensure online safety is safety is reflected as required in all relevant policies.
Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities
of the DSL and parental engagement.

Learning Opportunities identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

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

Learning Opportunities recognises that technology, and the risks and harms related to it, evolve and change rapidly. We will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.

The DSL has overall responsibility for online safety within the school but will liaise with other members
of staff, for example IT consultants, curriculum leads etc. as necessary. Amend as appropriate.

11 STAFF ENGAGEMENT & EXPECTATIONS

11.1 Awareness, Induction and Training

All members of staff have access to part one of 'Keeping Children Safe in Education' 2021 which covers safeguarding information for staff. They sign to acknowledge that they have read and understood its content. This information is kept on the staff shared area of the network.

The proprietor and senior leadership team, including DSLs will read KCSIE in its entirety.

The DSL will provide specific training to ensure that all new staff including agency staff receive safeguarding and child protection training as part of their Induction. This will include, how to recognise signs of abuse, how to respond to any concerns, online safety, and information to ensure they are aware of the schools internal safeguarding processes.

All staff members including agency will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues. This training will be updated at least
annually, and will include face to face whole-school training and access to a range of e-learning courses linked to specific safeguarding issues

Safeguarding training for staff, including online safety training, will be integrated, aligned and

considered as part of the whole school safeguarding approach and wider staff training and curriculum
planning.

In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates via staff meetings, INSET and email, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Learning Opportunities will maintain accurate records of staff induction and training, this is accessed via the staff shared area of the school network.
The Designated Safeguarding Lead will provide briefings to all staff on any changes to safeguarding legislation and procedures and relevant learning from local and national serious case reviews.

Staff will be encouraged to contribute to and shape school safeguarding arrangements and child protection policies through staff meetings and annual questionnaires.

The designated safeguarding lead will undergo training at least every two years to provide them with the knowledge and skills required to carry out the role. Training will provide a good understanding of their role as a DSL, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care.

In addition to formal training the DSLs will refresh their knowledge and skills at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

The Headteacher / DSL will hold fortnightly safeguarding meetings with the proprietor.

The Headteacher / DSL will maintain an up to date register of who has been trained.

The proprietor will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

11.2 Safer Working Practice

All members of staff are required to work within our clear guidelines on safer working practice as outlined in the staff code of conduct & AUP.

The DSL will ensure that all staff including agency have read the child protection policy and are aware of the school expectations regarding safe and professional practice via the staff code
of conduct and Acceptable Use Policy (AUP).

Staff will be made aware of the school behaviour management and physical intervention policies. Staff
will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Physical interventions and/or use of reasonable force
will be in line with our agreed policy and procedures and national guidance.

All staff will be made aware of the professional risks associated with the use of social media and

electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere
to relevant school policies including staff Acceptable Use Policies.

11.3 Supervision and Support

Learning Opportunities will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- All staff are supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

The DSL will also put staff in touch with outside agencies for professional support if they so wish.

12. SAFER RECRUITMENT & ALLEGATIONS (Refer to Learning Opportunities Safer Recruitment & Managing Allegations Policies)

12.1 Safer Recruitment and Safeguarding Checks

Learning Opportunities is committed to providing a safe culture and will take all necessary steps to recruit staff and volunteers who are safe to work with our students and staff. All individuals working in any capacity at our school have been subjected to rigorous safeguarding checks in line with relevant guidance in Keeping Children Safe in Education 2021 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)

We will ensure that agencies and third parties supplying staff provide us with written evidence that they have made the appropriate level of safeguarding checks on individuals working in our school. In respect of the enhanced DBS check, Learning Opportunities will ensure that written notification confirms the certificate has been obtained by either the employment agency.

Learning Opportunities fulfils its duty to maintain a single central record that covers all staff, including agency staff who work at the school.
The Single Central Record is available on the SLT shared area of the school network.

The proprietor/senior leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.

Learning Opportunities will respond to allegations in line with the local Kent allegations arrangements and Part Four of KCSIE 2021. In depth information can be found within our 'Managing Allegations against Staff' and staff code of conduct.

Any concerns or allegations about staff, including those which do not meet the allegation/harm

threshold will be recorded and dealt with appropriately in line with national and local guidance.

Where the headteacher is unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.

12.2 Safe Culture

As part of our approach to safeguarding, Learning Opportunities has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff code of conduct are constantly lived, monitored and reinforced by all staff and where all concerns are dealt with promptly and appropriately.

All staff should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. Learning Opportunities will take all concerns or allegations received seriously.

All members of staff are made aware of the school Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

12.3 Managing Allegations

The initial response taken by Learning Opportunities to an allegation where we identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, will be to contact children's social care and as appropriate the police immediately as per the processes outlined in Part one of KCSIE 2021.

Learning Opportunities has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.

- If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

12.4 Low Level Concerns

Learning Opportunities acknowledge that 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; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

13 OPPORTUNITIES TO TEACH SAFEGUARDING

Learning Opportunities will ensure that students are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships and Sex Education and Health Education.

We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of age appropriate contacts and strategies to ensure their own protection and that of others.

Learning Opportunities recognise that a one size fits all approach may not be appropriate for all students, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Our school systems support students to talk to a range of staff. Students will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

14 PHYSICAL SAFETY

14.1 Use of 'reasonable force'

There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our positive behaviour policy / positive handling policy.

14.2 Site Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of visitors coming into school as outlined within national guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor's badge whilst on site.

Staff and visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.

Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

Learning Opportunities will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be

treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

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Appendix A: Categories of Abuse

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or

adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

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

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

APPENDIX B SEXUAL VIOLENCE & HARRASSMENT

STATEMENT OF PRINCIPLES

All staff, students and parents / carers 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”;
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and
- understanding that all of the above can be driven by wider societal factors beyond the school, such as everyday sexist stereotypes and everyday sexist language.

TERMS AND PHRASES

Harmful sexual behaviour

Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two. Harmful sexual behaviour is considered in a child protection context.

When considering harmful sexual behaviour, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is smaller in stature.

Sexual violence
When referring to sexual violence in this policy, we do so in the context of child on child sexual violence and referring to sexual offences under the Sexual Offences Act 2003

What is consent?
Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape

Sexual harassment
Sexual harassment is unwanted conduct of a sexual nature between children that can occur online and offline. Sexual harassment (as set out below) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment.

Online sexual harassment refers to a range of behaviours where digital technologies are used to facilitate both virtual and face-to-face sexually based harms. Online sexual harassment may constitute a number of criminal offences, depending on the nature of the online harassment. Whether the conduct constitutes a criminal offence or not, many victim-survivors experience these behaviours as a form of sexual violence. Examples of online sexual harassment can be broadly split into the following areas:

- Unsolicited sexual content online refers to any sexual content shared online which is not wanted by the recipient. This could include content seen on apps, messaging services and websites which has not been sought out by the user.
- Image-based sexual abuse refers to the non-consensual creation and/or distribution of sexual images.
- Sexual coercion, threats and intimidation online could include a person receiving threats of a sexual nature or being coerced to engage in sexual behaviours on or offline via digital technologies.

While there are distinctions between these three categories above, there are evident overlaps and links.

It is important to be aware of some of the terms that are regularly used by the general public and the media when reporting on cases and the impact that the use of these terms may have on victims and survivors of sexual abuse/harassment/violence.

Victims and survivors rather than 'victims' or 'survivors'
Both these words have very different connotations and varying personal meanings for individuals. Some people identify as victims and some as survivors, therefore it is important to use the words

'victims and survivors' together when collectively referring to people that have been subjected to sexual violence and/or sexual harassment.

Alleged perpetrator
For the purpose of this document we will use the term 'alleged perpetrator' and where appropriate 'perpetrator'. These are widely used and recognised terms and the most appropriate to aid the effective writing of policies. Adults should, however, think very carefully about terminology, especially when speaking in front of children.

THE LAWS RELEVANT TO ONLINE SEXUAL HARASSMENT IN ENGLAND

Unsolicited sexual content online
There are a number of laws in which a person could be prosecuted for sending unsolicited sexual content online, however, the act in and of itself is not yet illegal in England and Wales (though it is in Scotland). Laws which could be applied to this include the Protection from Harassment Act 1997 and some aspects of the Sexual Offences Act 2003 such as 'causing a child to watch a sex act' and 'sexual communication with a child'.

Image-Based Sexual Abuse
As of 2015, it is 'an offence for a person to disclose a private sexual photograph or film if the disclosure is made without the consent of an individual who appears in the photograph or film, and with the intention of causing that individual distress'. In April 2017, the Sentencing Council included the 'threat to disclose intimate material or sexually explicit images', within its guideline for offences under the Communications Act 2003 (7); however, prosecuting threats of image-based sexual abuse remains challenging.

Under the Protection of Children Act 1978, creating or sharing indecent images of a child is illegal. It is illegal if the person creating the image is under the age of 18, even if they consent to it being created, or share it with children of the same age. The Home Office Recording Rules 'Outcome 21' (January 2016) allows police to respond in a proportionate way to reports of youth produced sexual imagery. This states that even though a young person has broken the law and the police may have evidence that they have done so, the police can record that they chose not to take further action as it was not in the public interest

Since April 2019, it has been an offence to take an image or video up a person's skirt without their consent, often referred to as 'upskirting'.

Sexual coercion, threats and intimidation online
Several sections of the Sexual Offences Act 2003 could be relevant in instances of sexual coercion, threats and intimidation including 'causing or inciting a child to engage in sexual activity'. In situations of demands for sexual images where threats are made, Section 21 of the Theft Act 1968 (Blackmail) is likely to apply.

All kinds of persistent harassment and stalking are offences under the Protection from Harassment Act 1997. What constitutes harassment or stalking is not explicitly defined, but can include a range of actions when considering the context, nature, and duration of the acts.

THE IMPACT OF SEXUAL HARASSMENT

The experience of online sexual harassment will of course be different for all young people. It is important to recognise that it can have both short- and long-term consequences for victims and survivors which will appear differently for each individual, impacting mental health and wellbeing.

What's the impact of unsolicited sexual content for young people?

- Severe mental distress - feeling threatened, intimidated and violated
- Violates dignity and autonomy of victims and survivors - it removes the right to control what we see and engage with online
- Leads to older siblings (who are still children) monitoring the content on younger siblings' social media platform to remove any unsolicited content. This puts additional pressure on older siblings to keep younger siblings safe
- Normalisation of non-consensual sexual activity and intimidation.
- What's the impact of image-based sexual abuse (IBSA) for young people?
- Severe mental distress - feeling threatened, violated and anxious regarding repercussions including fearing direct physical attacks, to name but a few
- Violates dignity and privacy of victims - it removes right to control who we share intimate images with
- Impacts on feelings of self-worth and self-esteem levels: IBSA can relate strongly to issues of body image and self-esteem
- Takes away right to freedom of sexual expression - feelings of shame from culture of blaming victim for their own abuse
- Normalisation of non-consensual sexual activity and sexual violence
- Social stigma can negatively impact peer relationships leading to risk of isolation
- School refusal if issues of social stigma begin to prevent a young person from feeling comfortable in the school setting

Victims fear chances of employment and other opportunities will be put at risk if images are put online or if there is police involvement.

What's the impact of sexual coercion, threats and intimidation for young people?

- Severe mental distress - feeling threatened, violated and anxious regarding repercussions including fearing direct physical attacks, to name but a few
- Violates dignity and privacy of victims - it removes right to control what we do online
- Impacts on feelings of self-worth and self-esteem levels: threatening IBSA can relate strongly to issues of body image and self-esteem
- Normalisation of non-consensual sexual activity and sexual violence
- Victim's fear chance of employment and other opportunities will be put at risk if employers or potential employers find images and police involvement

PREVENTION

Schools play an important role in preventative education. Keeping Children Safe in Education sets out that all schools should ensure children are taught about safeguarding, including how to stay safe online. Schools should consider this as part of providing a broad and balanced curriculum.

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

A planned curriculum as part of a whole school approach

The most effective preventative education programme will be through a whole- school approach that prepares pupils for life in modern Britain. The school will have a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of school life. This will be underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the whole curriculum. Such a programme should be developed to be age and stage of development appropriate (especially when considering SEND children and their cognitive understanding), and may tackle such issues as:

- healthy and respectful relationships;
- what respectful behaviour looks like;
- recognising and resisting pressure/seeking help;
- consent;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- practising assertiveness techniques;
- prejudiced behaviour;
- recognising and managing risk;
- understanding acceptable/unacceptable physical contact;
- that sexual violence, abuse and sexual harassment is always wrong; and
- addressing cultures of sexual harassment;
- human rights – the idea that all individuals have a right to fairness and to having their privacy respected;
- digital defence - educating young people on how to navigate online platforms and digital devices safely and effectively. It can include aspects of digital literacy related to privacy settings, reporting and blocking other users, identifying and addressing issues of online sexual harassment and recognising misinformation.

THE ROLE OF THE DSL

Any decisions are for the school to decide on a case-by-case basis, with the DSL taking a leading role, using their professional judgement and being supported by other agencies, such as children's social care and the police as required. The DSL will use the Brook toolkit to evaluate the level of risk.

Options to manage the report

When to inform the alleged perpetrator will be a decision that will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the DSL and relevant members of the Senior Leadership Team will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations.

As per general safeguarding principles, this will not stop us taking immediate action to safeguard our students, where required.

Responding to reports of sexual violence and sexual harassment

- all victims are reassured that they are being taken seriously
- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead
- where the report includes an online element, staff should not view or forward illegal images of a child.
- Do not promise confidentiality at this initial stage as it is very likely a concern will have to be shared further

- listen carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed,
- do not asking leading questions and only prompt the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- consider the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking.
- only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker.
- the designated safeguarding lead should make an immediate risk and needs assessment. The risk and needs assessment should consider:
    the victim, especially their protection and support;
    whether there may have been other victims,
    the alleged perpetrator(s); and
    all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments should be recorded (written or electronic) and should be kept under review.

The designated safeguarding lead should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required

School's initial response will give considerations to:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, adult students or school staff; and,
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Children sharing a classroom: Initial considerations when the report is made

Any report of sexual violence is likely to be traumatic for the victim. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing.

Whilst the school establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school should also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school premises and school transport, should be considered immediately.
In all cases, the initial report should be carefully evaluated. The wishes of the victim, the nature of the allegations and the protection of all children in the school or college will be especially important when considering any immediate actions.

The four likely scenarios for the Senior Leadership Team to consider when managing any reports of sexual violence and/or sexual harassment are:

1. Manage internally
In some cases of sexual harassment, for example, one-off incidents, we may take the view that the young people concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally through our behaviour and bullying policies and by providing pastoral support. This decision and response will be underpinned by the principle that sexual violence and sexual harassment is not acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded on My Concern.

2. Early help
We may decide that the young people involved do not require statutory interventions but may benefit from early help. This means providing support as soon as a problem emerges, at any point in a child's life. Early help can be particularly useful to address nonviolent harmful sexual behaviour and may prevent escalation of sexual violence.

The DSL and members of the Senior Leadership Team will follow the Local Safeguarding Partnership process and work alongside the relevant multi-agency early help team and parents and carers.
All concerns, discussions, decisions and reasons for decisions will be recorded on My Concern.

3. Referrals to children's social care
Where a young person has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to local children's social care. As part of our statutory duty, we would generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision will be made with the support of children's social care.
If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.

Where statutory assessments are appropriate, the DSL will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and survivor and, where appropriate, the alleged perpetrator and any other children that require support.

In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The DSL will refer again if we believe the young person remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL will consider other support mechanisms such as early help, specialist support and pastoral support.
All concerns, discussions, decisions and reasons for decisions will be recorded on My Concern.

4. Reporting to the police
Any report to the police will generally be in parallel with a referral to children's social care (as above) and will be led by the DSL. The police will be important partners where a crime might have been committed. Where a report of rape, assault by penetration or sexual assault is made, the starting principle is that this should be referred on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice approach in these cases. Referrals to the police will often be a natural progression of making a referral to children's social care.

At this stage, the DSL will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk.

When a report has been made to the police, the DSL will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. We will also discuss the best way to protect the victim and survivor and their anonymity.

In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, we will continue to engage with specialist support for the victim and survivor as required.
All concerns, discussions, decisions and reasons for decisions will be recorded on My Concern.

Appendix C Support Organisations

Additional links can also be found in KCSIE 2021 Annex B and D.

NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk

- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.org.uk

Contextual Safeguarding Network

- https://contextualsafeguarding.org.uk/

Kent Resilience Hub

- https://kentresiliencehub.org.uk/

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Peer on Peer abuse, including bullying, sexual violence and harassment

- Rape Crisis: https://rapecrisis.org.uk
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk

- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: https://moodspark.org.uk
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): https://www.nicco.org.uk/

APPENDIX C: FURTHER INFORMATION

1 **Female Genital Mutilation -** Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

1.1 **Indicators -** There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines , and Chapter 9 of those Guidelines (pp42-44) focuses on the role of schools and colleges.

Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to schools and colleges.

1.2 **Actions -** If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015. These procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

1.3 **Mandatory Reporting Duty**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon **teachers, along with social workers and healthcare professionals, 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. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

The Mandatory reporting duty commenced in October 2015. Teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve the Integrated Front Door as appropriate.

2 Fabricated Illness:

2.1 Staff must be aware of the risk of children being abused through fabricated illness. There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history;
- fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents;
- induction of illness by a variety of means.

2.2 Where this is identified and considered a risk a referral will be made to **The Integrated Front Door (IFD)** for support and guidance. School may involve other agencies in making their

assessments. That could include school nurse, community paediatrician, occupational therapists etc.

3 Gang and Youth Violence:

3.1 Children and Young People who become involved in Gangs are at risk of violent crime and as a result of this involvement are deemed vulnerable. Agencies and professionals have a responsibility to safeguard these children and young people and to prevent further harm both to the young person and their potential victims. Risks associated with Gang activity include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs, knife crime, sexual violence and substance misuse

3.2 **Indicators may be (age in brackets):**

- Troublesome (7-9; 10-12) / High daring (10-12) / Positive attitude towards delinquency (10-12) / Previously committed offences (7-9) / Involved in anti-social behaviour (10-12)
- Substance use (7-9) / Aggression (7-9) / Running away and truancy (7-9; 10-12) / Marijuana use (10- 12) / Marijuana availability (10-12) / Disrupted family (7- 9; 10-12) / Poor supervision (10-12)
- Low academic achievement in primary school (10- 12) / Learning disability (10-12) / Peers involved in crime and/or anti-social behaviour (7-9; 10-12)
- Children and young people in the neighbourhood involved in crime and/or anti-social behaviour (10-12)

(Preventing Youth Violence and gang Involvement for Schools and Colleges – Home Office)

4 Faith Based Abuse:

4.1 Our policy recognises the 'National Action Plan to Tackle Abuse linked to faith or belief' which describes this abuse as:

'not about challenging people's beliefs, but where beliefs lead to abuse that must not be tolerated. This includes belief in witchcraft, spirit possession, demons or the devil, the evil eye or djinns, dakini, kindoki, ritual or muti murders and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are not confined to one faith, nationality or ethnic community.'

4.2 When this type of abuse is suspected staff will make a referral will make a referral to KCSMP for support and guidance.

https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief

5 Risk to Trafficking:

5.1 Article 3 of the Palermo Protocol to Prevent, Suppress and Punish Trafficking In Persons, Especially Women And Children, Supplementing the United Nations Convention Against Transnational Organised Crime to the UN Convention (2000) (ratified by the UK on 6 February 2006) defines trafficking as:

(a) "Trafficking of persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a

minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

(b) The consent of a victim of trafficking in persons to the intended exploitation set forth in sub-paragraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used.

(c) The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered "trafficking in persons" even if this does not involve any of the means set forth in sub-paragraph (a) of this article

(d) "Child" shall mean any person under eighteen years of age.

5.2 Children trafficked into the country may be registered at a school for a term or longer, before being moved to another part of the UK or abroad. This pattern of registration and de-registration may be an indicator that a child has been trafficked. It has been identified as a particular concern in schools which are situated near ports of entry, but practitioners should be alert to this possibility in all schools. However, practitioners should always bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, traveller or migrant families – who collectively go missing from school.

5.3 If a member of the school staff suspects that a child may have been trafficked they should act immediately to inform the senior member of staff with designated responsibility for child protection and ensure that police or local authority children's social care are contacted immediately.

6 Risks Associated with Parent/Carer Mental Health:

6.1 The majority of Parents who suffer mental ill-health are able to care for and safeguard their children and/or unborn child. Some parents, however, will be unable to meet the needs and ensure the safety of their children. The school will follow the guidance outlined in 'working with parents with mental health problems and their children (Think child, think parent, think family: a guide to parental mental health and child welfare).

6.2 Our approach is to recognise; seek support; instil preventive factors and monitor. The Integrated Front Door can provide links and support with Wirral Adult Social Care if required. Designated teacher should seek support through TAF with family support but escalate to the Integrated Front Door if they are concerned that the child involved is being placed at immediate risk of harm. The ***CAMHS and Early Help Resource-and-Information-Pack*** details the Early Help services available to children, young people and their families. The offer includes mental health support services: .....

7 Drugs and Alcohol:

Children can be at risk of drugs and alcohol directly and indirectly. They may be at direct risk of having access to these substances (see guidance on gangs) or indirectly because they affect family life at home through use by parents/carers, siblings, child-minders etc.

8 Honour Based Violence and Forced Marriages:

8.1 Honour Based Violence and Forced Marriage refers to a collection of practices used to control behaviour within families to protect perceived cultural or religious beliefs and honour. Violence can occur when offenders perceive that a relative has shamed the family or

community by breaking their 'code of honour'. Honour Based Violence cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBV may exist.

8.2 'A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.' For more information see;

http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/

http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/case-studies/safer-schools-partnership

http://www.karmanirvana.org.uk/

9 Managing Allegations against staff:

9.1 The Local Authority Designated Officer for Allegations (**LADO) must be told of allegations against adults working with children and young people within 24 hours.** Chairs of Governors should refer to this guidance if there is an allegation against the headteacher. This includes all cases where a person is alleged to have:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children

9.2 The Local Authority Designated Officer for Allegations (LADO) is

LADO Team Contact Number: 03000 41 08 88

Email: kentchildrenslado@kent.gov.uk

If judged appropriate during the initial contact with the LADO, an Allegations Referral Form must be completed by the senior manager in full and forwarded to the LADO via email within 24 hours. LADO referral form and information can be accessed here:
https://www.kscmp.org.uk/procedures/local-authority-designated-officer-lado

The LADO procedure does not replace safeguarding procedures and the **Integrated Front Door** must be contacted if you have a safeguarding concern about a child. frontdoor@kent.gov.uk

If you require advice about your school's response to an allegation, please contact .....

The LADO can only provide advice and guidance regarding allegations in relation to a person in a position of trust. Any general safeguarding enquiries or concerns should be reported to Children's Services. The LADO cannot provide advice to professionals' subject to allegations, support and *investigation updates should be sought directly from the investigating agency or employer.*

10 Preventing Radicalisation:

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

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. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School 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 the Channel programme

10.1 **Prevent** - From 1 July 2015 all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ('The CTSA 2015') Schools must have regard to statutory PREVENT GUIDANCE issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools' responsibility to the need to prevent people from being drawn into terrorism."
This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies.

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes:

- risk assessment
- working in partnership
- staff training
- IT policies

Schools are expected to **assess the risk** of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. **It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty**. The Prevent duty builds on **existing local partnership arrangements**. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of Local Safeguarding Children Partnerships (LSCPs).

Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales.

The Prevent guidance refers to the importance of Prevent **awareness training** to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. *As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.*

Schools must ensure that children are safe from terrorist and extremist material when **accessing the internet** in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally.

The Department for Education has also published advice for schools on the Prevent duty and is intended to complement the Prevent guidance and signposts other sources of advice and support.

https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

10.2 Channel

School staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges are required to have regard to Keeping Children Safe in Education and, as partners, are required to cooperate with local Channel panels.

11 Child Missing Education: All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

11.1 A child going missing from education is a potential indicator of abuse or neglect. School and college staff should follow the school's or college's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

11.2 Schools should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both

registers. An appropriate response is needed when a child has poor attendance or is regularly missing education. https://www.gov.uk/government/publications/children-missing-education

11.3 **All** schools must inform their local authority of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by an appropriate medical practitioner as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

11.4 The local authority must be notified when a school is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

12 Child Sexual Exploitation & Child Exploitation (CE):

12.1 Child Sexual Exploitation (CSE) - CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can:

• children who have older boyfriends or girlfriends; and
• children who suffer from sexually transmitted infections or become pregnant.

The department provide: Child sexual exploitation: guide for practitioners

12.2 **Child Criminal Exploitation:** While there is still no legal definition of 'Child Criminal Exploitation' or CCE, it is increasingly being recognised as a major factor behind crime in

communities across Merseyside and the UK, while also simultaneously victimising vulnerable young people and leaving them at risk of harm. A simple definition of CCE is:

CCE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, drugs (especially cannabis), alcohol or even food and accommodation.

12.3 **County lines** is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines'. They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence and weapons, including knives, corrosives and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities. See KCSIE (2020) page 85.

12.4 **Child Sexual Exploitation & Child Criminal Exploitation:** Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

13 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 or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene 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
contact: being subjected to harmful online interaction with other users

conduct: personal online behaviour that increases the likelihood of, or causes, harm

For online safety, there is recognition in this guidance that most children are using data on their phones, on the 3G or the 4G network. In schools, this means that not only must staff think about filtering and monitoring within the school's infrastructure, they also need to have a policy about children accessing the internet whilst they're at school.

13.1 Filters and monitoring

Proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, Learning Opportunities monitors internet use using securus-software.com alongside smoothwall filtering.

Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, proprietors should consider the age range of their pupils, the number of pupils, how often they access the IT system and the proportionality of costs versus risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.119 The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like: UK Safer Internet Centre: appropriate filtering and monitoring. There is guidance on our website designed to help parents and carers to keep their children as safe as possible when online.

14 Pre-Appointment Checks:

14.1 Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

14.2 When appointing new staff, schools and colleges must

- Verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website;
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity);
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- schools that work with children between 8 and 18 years old must recognise that the 'relationships and associations' that staff have in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the school (Childcare Act 2006 – as amended).
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the GOV.UK website;
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate and

- verify professional qualifications, as appropriate.
- carry out prohibition check for all staff with QTS
- complete a risk assessment for each volunteer to decide whether they need to do an enhanced DBS check or not. (Please note:, even if it is decided an enhanced DBS is to be requested, if the volunteer is not in regulated activity, then you're not legally allowed to do a barred list check).

Further guidance can be found in Keeping Children Safe in Education (2021)

15 Single Central Record:

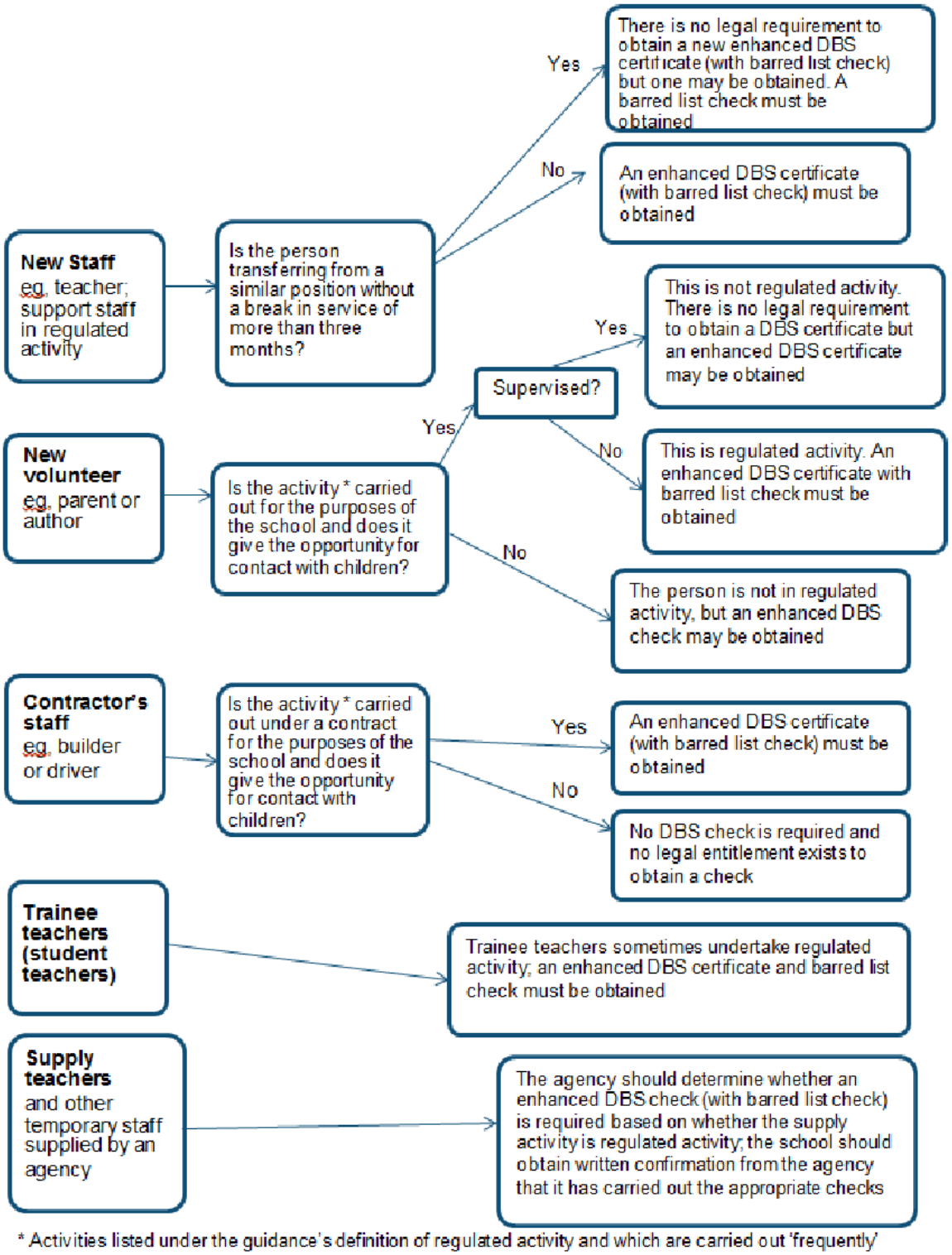
15.1 Schools and colleges must keep a single central record. The single central record must cover the following people:

- all staff (including supply staff, and teacher trainees on salaried routes) who work at the school: in colleges, this means those providing education to children; and
- The information that must be recorded in respect of staff members (including teacher trainees on salaried route) is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:
- an identity check / a barred list check / an enhanced DBS check/certificate / a prohibition from teaching check;
- further checks on people who have lived or worked outside the UK; this would include recording checks for those EEA teacher sanctions and restrictions
- a check of professional qualifications; and a check to establish the person's right to work in the United Kingdom.

15.2 For supply staff, schools should also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff, and the date that confirmation was received.

15.3 A record of staff leavers must be maintained on the Single Central record.

15.4 The SCR shall be updated in the light of any further legislation.



Disclosure and Barring service criminal record checks and barred list checks