

#### LEARNING OPPORTUNITIES

# Safeguarding Policy and Procedures Incorporating Child Protection

This core policy forms part of the induction and ongoing training for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents. Their understanding and compliance will be monitored on a regular basis.

**Review Date: August 2023** 

**Previous Review Date: August 2022** 

Date agreed and ratified by the Proprietor: 22.08.2023

Date of next full review: August 2024

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

The proprietor has a strategic leadership responsibility for Learning Opportunities safeguarding arrangements and ensures compliance with their duties under legislation. They have regard to guidance contained in KCSIE 2023, ensuring policies, procedures and training are effective and comply with the law at all times.

The proprietor completes safeguarding and child protection (including online) training to the same level as the DSLs, which equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place within the school are effective and support the delivery of a robust whole school approach.

This policy will be reviewed <u>at least</u> annually and/or following any updates to national and local guidance and procedures.

## **Key Contacts**

	Name	Contact information
	Simon Graydon (Headteacher)	simong@learningopps.org 01304 381906 / 07394 984289 / 01304 371527
	Kevin Dunk (Deputy Headteacher)	kevind@learningopps.org
Designated Safeguarding Leads (DSLs)	(Departy Fridadesial)	01304 381906 / 01304 371527 / 07546 724134
	Catherine Graydon	catherineg@learningopps.org
		01304 381906 / 07394 984289 / 01304
		371527
Headteacher	Simon Graydon	07394 984289
Safeguarding Proprietor	Lesley Buss	lesleyb@learningopps.org
		07860 139678

INFORM YOUR DESIGNATED SAFEGUARDING LEADS		
Simon	Kevin	Catherine
simong@learningopps.org	kevind@learningopps.org	catherineg@learningopps.org

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### What to do if you have a welfare concern in LOC

#### Why are you concerned?

#### For example

- Something a child has said for example, an allegation of harm
- Child's appearance may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

#### Act immediately and record your concerns. If urgent, speak to a DSL first.

Follow the school procedure

- Reassure the child
- Clarify concerns, using open questions if necessary (TED: Tell, Explain, Describe)
- Use child's own words, record facts not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL (Simon Graydon, Kevin Dunk, Catherine Graydon)

#### Inform the Designated Safeguarding Lead

#### **Designated Safeguarding Lead**

- Consider whether a child is at immediate risk of harm; are they safe to go home?
- If a child is at risk of immediate harm, call the Integrated Front Door on 03000 411 111 (outside office hours 03000 419 191) or the Police on 999 immediately.
- Access the Kent Safeguarding Support Level Guidance document and procedures: <a href="www.kscmp.org.uk">www.kscmp.org.uk</a>
- Refer to other agencies as appropriate, for example, Internal or community services, early help open access, LADO, Police, or make a Request for Support via Integrated Children's Services: 03000 411 111
- If unsure, consult with Area Education Safeguarding Advisor (03301 651 340) or Local Authority Social Worker at the Front Door: <a href="https://www.kscmp.org.uk">www.kscmp.org.uk</a>

## If you are unhappy with the response

#### Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures

#### **Students and Parents:**

 Follow school complaints procedures www.learningopps.org

#### Record decision making and action taken using My Concern

#### **Monitor**

#### Be clear about:

- What you are monitoring. For example behaviour trends, appearance.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

**Review** and **request further support** if necessary

At all stages, the child's circumstances will be kept under review
The DSL/staff will request further support if required to ensure the **child's safety** is

paramount

## Education Safeguarding Service Contacts Note: The Education Safeguarding Service returned to KCC on 01.04.23

Head Office: Room 2.30 Sessions House, County Hall, Maidstone ME14 1XQ

Claire Ray Head of Service	03000 423 169
Rebecca Avery Training & Development Manager	03000 423 168
Robin Brivio Senior Safeguarding Advisor	03000 423 169
Ashley Assiter Online Safety Development Officer	03000 423 164

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 423 154
Canterbury	03000 423 157
Dartford	03000 423 149
Dover	03000 423 154
Folkestone & Hythe	03000 423 154
Gravesham	03000 423 149
Maidstone	03000 423 158
Sevenoaks	03000 423 149
Swale	03000 423 157
Thanet	03000 423 157
Tonbridge & Malling	03000 423 158
Tunbridge Wells	03000 423 158

## **Kent County Council Key Contacts**

Integrated Front Door: 03000 411111 (outside office hours 03000 419191)

Early Help Contacts (district teams) can be found on <a href="https://www.kelsi.org.uk">www.kelsi.org.uk</a>

Note: From April 2023 all professional referrals need to be submitted via Kent Integrated Children's Services Portal

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 – David Adams 03000 414989 David.Adams@kent.gov.uk	
East Kent – Marisa White 03000 418794 Marisa.White@kent.gov.uk	
West Kent – Nick Abrahams 03000 410058 Nicholas.Abrahams@kent.gov.uk	
North Kent – Ian Watts 03000 414302 <u>lan.Watts@kent.gov.uk</u>	

Assistant Director Contest & Serious Organised Crime (SCO)	
Nick Wilkinson – <u>nick.wilkinson@kent.gov.uk</u>	

Kent & Medway 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

## 1. Child Focused Approach to Safeguarding

Essentially, safeguarding means protecting children from harm, so they can grow up safe, happy and healthy.

Child protection is part of safeguarding. The term child protection refers explicitly to protecting children who are suffering, or are likely to suffer, significant harm.

Learning Opportunities acknowledges that to effectively safeguard children, it is important to know about safeguarding issues **beyond** the **4 main types of abuse**.

#### 1.1 Introduction

- Learning Opportunities recognise our statutory responsibility to safeguard and promote the welfare
  of all children. Safeguarding and promoting the welfare of children is everybody's responsibility and
  everyone has a role to play. All members of our community (staff, volunteers, proprietor, leaders,
  parents/carers, wider family networks, and students) have an important role in safeguarding children
  and all have an essential role to play in making our community safe and secure.
- 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 or orientation, have equal rights to protection.
- Staff working with children at Learning Opportunities will maintain an attitude of 'it could happen here'
  where safeguarding is concerned. When concerned about the welfare of a child, 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 and act immediately.
- This policy applies where there are any child protection concerns regarding children who attend the school but may also apply to other children connected to the school, for example, siblings.
- Learning Opportunities recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our school students are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Learning Opportunities recognises the importance of adopting a trauma informed approach to safeguarding; we understand there is a need to consider the root cause of children's behaviour and consider any underlying trauma.
- Our core safeguarding 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: adopt a child centred approach and provide support for all students, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm
  - Collaboration: with both parents / carers where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise..
- The procedures contained in this policy apply to all staff, including the proprietor, temporary or thirdparty agency staff and volunteers, and are consistent with those outlined within KCSIE 2023.

#### 1.2 Policy context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2023 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- 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 2023 (KCSIE)
  - Working Together to Safeguard Children 2018 (WTSC)
  - Ofsted: Education Inspection Framework'
  - o Framework for the Assessment of Children in Need and their Families 2000
  - Kent and Medway Safeguarding Children Procedures
  - Early Years and Foundation Stage Framework 2021 (EYFS)
  - The Education Act 2002
  - o The Education (Independent School Standards) Regulations 2014
  - o The Non-Maintained Special Schools (England) Regulations 2015
  - The Human Rights Act 1998
  - The Equality Act 2010 (including the Public Sector Equality Duty)
- 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.
- Learning Opportunities will follow local or national guidance in response to any emergencies. We
  will amend this policy and our procedures as necessary but regardless of the action required, our
  safeguarding principles will always remain the same, the welfare of the child is paramount.
- Learning Opportunities recognise 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 experienced increased welfare and/or safeguarding risks. We will work
  with local services, such as health and the local authority, to ensure necessary support is in place.

#### 1.3 Definition of safeguarding

- In line with 'Working Together to Safeguard Children' and KCSIE 2023, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
  - o providing help and support to meet the needs of children as soon as problems emerge
  - protecting children from maltreatment, whether that is within or outside the home, including online
  - o 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
  - o promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
  - taking action to enable all children to have the best outcomes.
- Child protection is part of safeguarding and promoting the welfare of all children and is defined as
  activity that is undertaken to protect specific children who are suspected to be suffering, or likely to
  suffer, significant harm. This includes harm that occurs inside or outside the home, including
  online.
- Learning Opportunities acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect
  - o Bullying, including cyberbullying

- Child-on-child abuse
- Children with family members in prison
- Children who are absent or missing from education
- 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
- o Drugs and alcohol misuse
- Fabricated or induced illness.
- Faith abuse
- Gender based abuse and violence against women and girls
- o 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
- Preventing radicalisation and extremism
- o Private fostering
- o Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- o 'Upskirting'

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2023)

#### 1.4 Related safeguarding policies

- 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:
  - Anti-bullying
  - Attendance
  - Behaviour, including positive behaviour management and use of physical intervention
  - o Complaints
  - Confidentiality
  - o Data protection and information sharing
  - o Emergency procedures such as evacuations and lockdowns
  - Health and safety
  - First aid and accidents, including medication and managing illness, allergies, heath, and infection
  - o Image use
  - o Managing allegations against staff
  - Mobile and smart technology
  - Online safety
  - o Personal and intimate care
  - Relationship, Sex and Health Education (RSHE)
  - Risk assessments, such as school trips, use of technology
  - Safer recruitment
  - Social media
  - Staff behaviour policy/code of conduct, including Acceptable Use of Technology Policies (AUP)
  - Whistleblowing

#### Supporting Guidance (to be read and followed alongside this document)

- "Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings" - Safer Recruitment Consortium
- "What to do if you are worried a child is being abused" DfE, March 2015

These documents can be found in the shared area of the school network.

#### 1.5 Policy compliance, monitoring and review

- 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 staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One, Annex A & Annex B of KCSIE 2023 as appropriate. These documents can be accessed via the shared area of the school network.
- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website: <a href="https://www.learningopps.org">www.learningopps.org</a>
- The policy forms part of our school improvement plan and will be reviewed annually by the proprietor and leadership team who have responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Leads and headteacher will ensure regular reporting on safeguarding activity and systems to the proprietor. The proprietor is trained to the same level as all DSLs within the school and as appropriate will receive details of individual student situations or identifying features of families as part of their oversight responsibility.

## 2. Key Responsibilities

#### 2.1 Governance and leadership

- The proprietor and 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 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The proprietor will facilitate a whole school approach to safeguarding which involves everyone. They
  will ensure that safeguarding and child protection are at the forefront and underpin all relevant
  aspects of process and policy development, so that all systems, processes, and policies operate with
  the best interests of the child at their heart.
- The proprietor is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).
- The proprietor and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.

- The headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the proprietor, are understood, and followed by all staff.
- The proprietor will ensure appropriate senior members of staff, from the school leadership team, are
  appointed to the role of designated safeguarding lead. The proprietor and leadership team 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 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.

#### 2.2 Designated Safeguarding Leads (DSLs)

- The school has appointed Simon Graydon (Headteacher) and Kevin Dunk (Deputy Headteacher) as members of the leadership team, as the Designated Safeguarding Leads (DSLs), they are supported in this role by Catherine Graydon (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in school. The ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The DSL will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2023. 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
  - Coordinating 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 2023 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 (KSCMP) procedures, including referrals, are followed, as necessary.
  - Representing, or ensuring 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 (during school hours) for staff in the school to discuss any safeguarding concerns.
  - Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
  - 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.
  - Liaising with the headteacher / proprietor to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (<u>PACE Code C 2019</u>).

 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.

#### 2.3 Members of staff

KCSIE 2023 places greater emphasis on filtering & monitoring systems. Staff need to understand the expectations, roles and responsibilities around these systems.

- Our staff play a particularly important role in safeguarding as they are in a position to observe any changes in a student's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- All members of staff have a responsibility to:
  - o provide a safe environment in which children 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 child tells them that they are being abused, neglected, or exploited and understand the impact abuse and neglect can have upon a child.
  - be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
  - o be prepared to identify children who may benefit from early help.
  - o understand the early help process and their role in it.
  - o understand the school safeguarding policies and systems.
  - o 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.
  - o know how to maintain an appropriate level of confidentiality.
  - reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
  - act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
  - Staff at Learning Opportunities recognise that children may not feel ready or know how to tell
    someone that they are being abused, exploited, or neglected, and/or they may not recognise
    their experiences as being abusive or harmful. Disabilities, sexual orientation, vulnerabilities and
    language barriers might also affect children's ability or willingness to talk about abuse. This
    should not prevent staff from having professional curiosity and speaking to a DSL if they have
    any concerns about a child.
  - Staff at Learning Opportunities will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff code of conduct and student positive behaviour policy.

#### 2.4 Children and young people

- Children and young people 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.
  - o Contribute to the development of school safeguarding policies.
  - Receive help from a trusted adult.
  - o Learn how to keep themselves safe, including online.

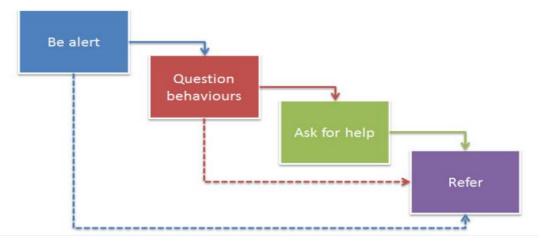
#### 2.5 Parents and carers

- Parents/carers have a responsibility to:
  - o Understand and adhere to the relevant school policies and procedures.
  - Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
  - o 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.

#### 3. Child Protection Procedures

#### 3.1 Recognising indicators of abuse and neglect

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- 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 2023. This is outlined locally within the <u>Kent Support Levels Guidance</u>.
- Learning Opportunities recognise that when assessing whether a child may be suffering actual or
  potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
  - Physical abuse
  - Sexual abuse
  - o Emotional abuse
  - Neglect
- By understanding the indicators or 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.
- The key thing to look for is a change in the student. Staff do not need to 'diagnose' an issue or know
  exactly what it might be, just notice that something might be wrong and act. It's for others to
  investigate what the issue might be.
- Students can try to communicate that something's wrong through their behaviour, either intentionally or unintentionally.
- Staff should be professionally curious about what might be behind the change they are seeing
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child - What to do if you are worried a child is being abused' 2015:



- 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-bycase 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 behaviors can indicate child abuse or neglect, so staff will be alert to parent-child
  interactions or concerning parental behaviours; this could include parents / carers who are under
  the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children 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; extrafamilial 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.
- Learning Opportunities recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- Learning Opportunities recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
  - Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school positive behaviour policy which is informed by the DfE 'Searching, screening and confiscation at school' guidance.
  - Only the headteacher, or a member of staff authorised by the headteacher, can carry out a search.
  - The Headteacher and DSL will then consider the circumstances of the student who has been searched to assess the incident against any potential wider safeguarding concerns.

#### 3.2 Responding to child protection concerns

- If staff are made aware of a child protection concern, they are expected to:
  - o listen carefully to child, reflecting back the concern.
  - o use the child's language.
  - be non-iudamental.
  - avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example who, what, where, when or Tell, Explain, Describe (TED).
  - o not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
  - o be clear about boundaries and how the report will be progressed.

- record the concern using the facts as the child presents them, in line with school record keeping requirements using Mt Concern.
- o inform the DSL as soon as practically possible.
- Students might also try to tell someone about their abuse indirectly. This is sometimes known as an 'indirect disclosure'. They might make ambiguous verbal statements, such as "I don't want to stay there" and "Grandpa's snoring keeps me awake at night", communicate through their behaviour for example, self-harming, becoming withdrawn or 'acting out' to try to communicate their distress, communicate non-verbally for example, writing a letter or drawing pictures. If staff notice any of the above, they should ask the student if everything is okay and chat to them about the behaviour they've noticed, and/or ask another member of staff who the student trusts to do the same.
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL.
- The DSL should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information, see flowchart). In these circumstances, any action taken will be shared with a DSL as soon as is possible.
- All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
- Learning Opportunities will respond to safeguarding 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: <a href="https://www.kscmp.org.uk">www.kscmp.org.uk</a>
- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: <a href="www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services">www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services</a>
- Where it is identified a child may benefit from Early Help support (as provided by <u>ICS</u>), the DSL (or deputy) 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 <u>Education Safeguarding</u> Service if the situation does not appear to be improving or is getting worse.
- All staff are made aware of the process for making referrals to Integrated Children's Services
  and for statutory assessments under the Children Act 1989, especially section 17 (children in
  need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a
  referral, along with the role they might be expected to play in such assessments.
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Kent <u>Integrated Children's Services</u> (via the 'Front Door') 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 an 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 <u>Integrated Children's Services</u> (ICS).
- In the event of a request for support to the Front Door 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.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the <u>KSCMP escalation</u> <u>procedures</u> to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the <u>Education Safeguarding Service</u>.
- DSLs and staff will be mindful of the need for Learning Opportunities to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the school where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network. Where the school is unsure, advice will be sought from the Education Safeguarding Service.

#### 3.3 Recording concerns

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be
  recorded on the school safeguarding incident / welfare / concern electronic safeguarding system
  'My Concern' and passed without delay to the DSL. Our records will include a clear and
  comprehensive summary of any concerns, details of how concerns were followed up and
  resolved, and a note of any action taken, decisions reached and outcomes.
- Records will be completed as soon as possible after the incident/event, using the child's words
  and will be signed and dated by the member of staff. Child protection records will record facts
  and not personal opinions. A body map will be completed on My Concern if visible injuries to a
  child have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing My Concern 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.
- The My Concern 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.
- Child protection records will be recorded on My Concern which is a safe and secure software for recording and managing all safeguarding concerns. This system ensures that Child protection records are kept for individual students and are maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely.
- 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; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child

protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.

- 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 from another setting, the DSL will ensure key staff will be made aware of relevant information as required.
- Where a student joins the school and no child protection files are received, the DSL will
  proactively seek to confirm from the previous setting whether any child protections exist for the
  student, and if so, if the files have been sent.

#### 3.4 Multi-agency working

- Learning Opportunities recognises the pivotal role we have to play in multi-agency safeguarding
  arrangements and is committed to its responsibility to work within the <u>KSCMP</u> multi-agency
  safeguarding arrangements as identified within 'Working Together to Safeguard Children'.
- Learning Opportunities leadership team, proprietor and DSL will work to establish strong and cooperative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- 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 <a href="KSCMP">KSCMP</a> 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.
- Learning Opportunities will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The headteacher and DSL are aware of the requirement for children to have an Appropriate Adult (<u>PACE Code C 2019</u>) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school behaviour policy, which is informed by the DfE '<u>Searching</u>, screening and confiscation at school' guidance.

#### 3.5 Confidentiality and 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.
- Where reasonably possible, the school will hold more than one emergency contact number for each student. There is an expectation that contact information will be held for both parents, unless doing so would put a child at risk of harm.
- Learning Opportunities has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. Learning Opportunities DPO is Lesley Buss (Proprietor) who can be contacted via email lesleyb@learningopps.org

- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK 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 2023). KCSIE 2023, the <a href="Information Commissioner's Office">Information Sharing advice for safeguarding practitioners</a> guidance provides further details regarding information sharing principles and expectations.
- The headteacher and DSL will disclose relevant safeguarding information about a student 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, staff 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.
- In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL and Kent Integrated Children's Services. All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

#### 3.6 Complaints

- 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 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
- 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 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 8 of this policy.

## 4 Specific Safeguarding Issues

- Learning Opportunities is aware of the 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 2023 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 follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

#### 4.1 Child-on-child abuse

- All members of staff at Learning Opportunities recognise that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of school and online.
- Learning Opportunities recognises that child-on-child abuse can take many forms, including but not limited to:
  - o Bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - Abuse in intimate personal relationships between children
  - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm - this may include an online element which facilitates, threatens and/or encourages physical abuse
  - Sexual violence such as rape, assault by penetration and sexual assault this may include an online element which facilitates, threatens and / or encourages sexual violence.
  - Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or a broader pattern of abuse causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - Consensual and non-consensual sharing of 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
  - o Initiation/hazing type violence and rituals, may also include an online element
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this
  child protection policy and KCSIE 2023 (in particular, part two and five).
- Learning Opportunities adopts a zero-tolerance approach to child-on-child abuse. We believe that
  abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part
  of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can
  create an unsafe environment for children and a culture that normalises abuse, which can prevent
  children from coming forward to report it.
- All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise
  that some child-on-child abuse issues may be affected by gender, age, ability and culture of those
  involved. For example, for gender based abuse, girls are more likely to be victims and boys more
  likely to be perpetrators.
- Learning Opportunities recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported.
   As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
- In order to minimise the risk of child-on-child abuse, Learning Opportunities will:
  - o implement a robust anti-bullying policy
  - o provide an age/ability appropriate PSHE and RSE curriculum
  - o 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 child-on-child 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.

- Concerns about students' behaviour, including child-on-child 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.
- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
  - o taking reports seriously
  - listening carefully
  - o avoiding victim blaming
  - o providing appropriate pastoral support
  - working with parents/carers
  - o reviewing educational approaches
  - o following procedures as identified in other policies, for example, the school anti-bullying, behaviour and child protection policy, and
  - o where necessary and appropriate, informing the police and/or ICS.

#### 4.2 Child-on-child sexual violence and sexual harassment

- 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 2023.
- Learning Opportunities recognises that sexual violence and sexual abuse can happen anywhere, and
  all staff will maintain an attitude of 'it could happen here.' 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
  and can occur online and face to face (both physically and verbally). Sexual violence and sexual
  harassment is never acceptable.
- <u>All</u> victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, 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 ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection, online safety.
- Learning Opportunities recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to students that avoids alarming or distressing them.
- Learning Opportunities recognises that an initial disclosure to a trusted adult may only be the first
  incident reported, rather than representative of a singular incident and that trauma can impact
  memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware
  certain children may face additional barriers to telling someone, for example because of their
  vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
  - 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, in line with part five of KCSIE

- 2023 and relevant local/national guidance and support, for example <u>KSCMP</u> procedures and support from the <u>Education Safequarding Service</u>.
- 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, all other children, and staff and any actions that are required to protect them.
- Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the school and where necessary will be referred to <u>Integrated Children's Services</u> (Early Help and/or Children's Social Work Service) and/or the police.
   Important considerations which may influence this decision include:
  - the wishes of the victim in terms of how they want to proceed.
  - o the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
  - the ages of the children involved.
  - the developmental stages of the children involved.
  - o any power imbalance between the children.
  - 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.
  - o that sexual violence and sexual harassment can take place within intimate personal relationships between children.
  - o understanding intra familial harms and any necessary support for siblings following incidents.
  - whether there are any ongoing risks to the victim, other children, or school staff.
  - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the <u>Education</u> Safeguarding Service.

#### 4.3 Nude and/or semi-nude image sharing by children

- Learning Opportunities recognises that consensual and non-consensual sharing of nudes and seminude 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:
  - o to report any concerns to the DSL immediately.
  - never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
  - o not to delete the imagery or ask the child to delete it.
  - o to avoid saying or doing anything to blame or shame any children involved.
  - to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.

- o not to investigate or ask the child(ren) involved to disclose information regarding the imagery
- o to not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.
- DSLs will respond to concerns in line with 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/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.
  - o All decisions and action taken will be recorded in line with our child protection procedures.
  - o 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 thirteen, 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 <u>Education Safeguarding Service</u>.

#### 4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- The government is currently discussing the introduction of a 'mandatory reporting duty' when it comes to child sexual abuse. This would mean that a failure to report any concerns related to child sexual abuse could lead to sanctions.
- Learning Opportunities policy is that we expect all staff to report any concerns no matter how lowlevel, and this report must be done immediately. Staff should always be alert for signs of sexual abuse
- Learning Opportunities recognises that both 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.
- Learning Opportunities recognises that children can become trapped in CCE as perpetrators can
  threaten victims and their families with violence or entrap and coerce them into debt. Children
  involved in criminal exploitation often commit crimes themselves which can mean their vulnerability
  as victims is not always recognised (particularly older children) and they are not treated as victims,
  despite the harm they have experienced. The experience of girls who are criminally exploited can
  also be very different to that of boys. We also recognise that boys and girls being criminally exploited
  may be at higher risk of child sexual exploitation (CSE).
- Learning Opportunities recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or

images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.

• 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.

#### 4.5 Serious violence

- All staff are 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. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.
- Any concerns regarding serious violence will be reported and responded to in line with other child
  protection concerns by speaking with a DSL. 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.

#### 4.6 So-called Honour Based Abuse (HBA)

- 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.
- Following a change in law from February 2023 around forced marriage, it is now a crime to carry
  out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if
  violence, threats or another form of coercion are not used. This applies to non-binding, unofficial
  'marriages', as well as legal marriages.
- All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL. If there is an immediate threat, the police will be contacted.
- All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage.
   Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or <a href="mailto:fmu@fcdo.gov.uk">fmu@fcdo.gov.uk</a>
- Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific legal reporting duty on teachers.
  - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out on a girl.
  - o It will be rare for teachers to see visual evidence, and they should not be examining students, however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: <a href="Mandatory reporting">Mandatory reporting</a> and <a href="FGM Mandatory reporting">FGM Mandatory reporting</a> Duty Fact Sheet.

Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL (or a deputy), and Kent Integrated Childrens Services should be informed as appropriate.

#### 4.7 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 <u>specific obligations</u> 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 <u>local procedures</u> to follow. If there is an immediate threat, the police will be contacted via 999.

#### 4.8 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 <u>Cyber Choices</u> 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 the child protection and other appropriate policies.

#### 4.9 Domestic abuse

- Learning Opportunities recognises that:
  - o domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
  - domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse.
  - children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
  - anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.
  - o domestic abuse can take place within different types of relationships, including ex-partners and family members.
  - there is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
  - o domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
  - domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.

- o it is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.
- Learning Opportunities is an <u>Operation Encompass School</u>.
  - This means we work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the school when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.
    - Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and enables us to put immediate support in place according to the child's needs.
    - Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the front door will be made if there are any concerns about a child's welfare.
    - Where the school is unsure of how to respond to a notification, advice will be sought from the Education Safeguarding Service or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL.

#### 4.10 Mental health

- All staff recognise 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 (ACEs), 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 or a deputy.

#### 4.11 Modern Slavery

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: Modern slavery: how to identify and support victims.
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will and responded to in line with this policy.

## 5 Supporting Children Potentially at Greater Risk of Harm

Whilst <u>all</u> children should be protected, Learning Opportunities acknowledge that some groups of children are potentially at greater risk of harm. This can include the following groups:

#### 5.1 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.
- Learning Opportunities recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential 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.
- To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the Leadership Team to plan support as required.

#### 5.2 Children requiring mental health support

- Learning Opportunities has an important role to play in supporting the mental health and wellbeing
  of our students. 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.
- Where there are concerns regarding possible mental health problems for students, staff should:
  - inform the DSL and Headteacher who will determine the most appropriate referral / escalation route
  - provide students with 'emotionally available' adults. In effect this means that staff will focus
    on building rapport with students to help children regulate their emotions and reduce their
    levels of emotional stress.
  - o use of the curriculum and Thrive approach to promote well-being
  - o follow the school's behaviour policy which has moved from sanction-based to implementing a 'relationship-based policy' which underpins the importance of understanding the causes of students' challenging behaviour and responding in an empathetic and understanding manner.
  - engage in proactive engagement with families and outside agencies to promote consistent support for student's health and wellbeing
- Age/ability appropriate education will be provided to our students to help promote positive health, wellbeing, and resilience.

#### 5.3 Children Who are Absent from Education

KCSIE 2023 provides clarity around the difference between children who are absent from education vs. children missing education.

**A child absent from education** is a child who is on roll at a school, but is very regularly not attending.

<u>A child missing education</u> is a child of compulsory school age who isn't on a school roll or being educated elsewhere.

Being absent from education, and missing education, are vital warning signs of safeguarding risks to a child. There has been a significant increase in children absent from education since school closures during the COVID-19 pandemic – these are often referred to in the media as 'ghost children'. They may have mental health issues that affect their ability to return to school, or their family circumstances may have changed, or they may have been groomed and exploited during the pandemic.

- Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- A robust response to children who are absent from education for prolonged periods and/or on repeat occasions will support the identification of such abuse and may help prevent the risk of children going missing in the future. This includes when problems are first emerging and also where children are already known to Kent Integrated Childrens Services and/or have a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.
- Where possible, the school will hold more than one emergency contact number for each student, so
  we have additional options to make contact with a responsible adult if a child missing education is
  also identified as a welfare and/or safeguarding concern.
- Where the school have concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: <u>Children missing education</u>) and local policies. Local support is available via the <u>PRU</u>, <u>Inclusion and Attendance Service (PIAS)</u>.

Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education. Please see part two of KCSIE links to other relevant guidance.

#### **5.4 Elective Home Education (EHE)**

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 <u>national Elective Home Education guidance</u> and local <u>Kent guidance</u>. We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

#### 5.5 Children who need a social worker (child in need and child protection plans)

- 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.

#### 5.6 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 school has appointed a 'designated teacher' Simon Graydon (Headteacher) who works with
  local authorities, including the Virtual School Kent (including the virtual school head), to promote
  the educational achievement of registered pupils who are looked after or who have been previously
  looked after.

- The designated teacher will work with the DSL 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 student 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.

#### 5.7 Children who are Lesbian, Gay, Bi, or Trans (LGBT)

- Nearly half of LGBTQ+ children experience bullying in school, and 1 in 10 find themselves having to leave their family home due to their sexuality or gender identity.
- The fact that a child or a young person may be LGBT+ is not in itself an inherent risk factor for harm, however, Learning Opportunities recognises that children who are LGBT+ or are perceived by other children to be LGBT+ (whether they are or not) can be targeted by other children or others within the wider community.
- Learning Opportunities recognises risks can be compounded where children who are LGBT+ lack a
  trusted adult with whom they can be open. LGBT+ is included within our Relationship and Sex
  Education and Health Education curriculum and our staff will endeavour to reduce the additional
  barriers faced and provide a safe space for children to speak out or share any concerns.
- We recognise that students don't need to be LGBTQ+ to be subject to homophobic, biphobic or transphobic bullying. They may still be on the receiving end of this abuse if they are perceived to be LGBTQ+, regardless of their own identity.

#### 5.8 Children who are privately fostered

- Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.
- Where private fostering arrangements come to the attention of the school, we must notify Kent
  Integrated Childrens Services in line with the local <u>KSCMP arrangements</u> in order to allow the local
  authority to check the arrangement is suitable and safe for the child.

#### 6 Online Safety (Refer to LOC Online Safety policy)

The DSL has lead responsibility for Online Safety within the school.

Learning Opportunities recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities.

- 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 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 (including consensual and nonconsensual 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. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online.
- The headteacher will be informed of any online safety concerns by the DSL, as appropriate.

## 7 Staff Engagement and Expectations

#### 7.1 Staff awareness, induction and training

- All members of staff have been provided with a copy of part one and annex A & B of 'Keeping Children Safe in Education' 2023 which covers safeguarding information for staff.
  - School leaders, including the DSL will read KCSIE in its entirety.
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This record is kept on the shared area of the school network.
- It is a requirement that all members of staff have access to this policy and sign to say they have read <a href="mailto:and">and</a> understood its contents. All staff are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements.

- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child
  protection training (including online safety, which, amongst other things, will include ensuring an
  understanding of the expectations, applicable roles and responsibilities in relation to filtering and
  monitoring) to ensure they are aware of the school internal safeguarding processes, as part of their
  induction. This will include:
  - specific training by the DSL
  - completion of e-Learning courses.
  - Information / guidance leaflets

This training is regularly updated and is in line with advice from the safeguarding partners.

- The proprietor completes safeguarding and child protection (including online safety) training at the same level as the DSLs. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. The Proprietor completes annual refresher training.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns This training will be updated at least annually. This includes:
  - Face-to-face whole school training
  - Completion of a range of e-learning courses linked to specific safeguarding issues
  - Regular updates / refreshers via staff meetings / INSET / termly safeguarding newsletters
- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. This includes:
  - specific online safety training
  - annual updates.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively for example via email, e-bulletins, staff meetings.
- Learning Opportunities recognises the expertise staff build by undertaking safeguarding training and
  from managing safeguarding concerns on a daily basis. Staff are encouraged to contribute to and
  shape school safeguarding arrangements and child protection policies. This is achieved through
  inviting input from knowledgeable and experienced staff, inviting input at staff meetings and annual
  questionnaires.
- The DSL and headteacher hold termly safeguarding meetings with the proprietor the details of which
  are recorded. The DSL and Headteacher also detail safeguarding training undertaken by all staff
  and maintain an up-to-date record of who has been trained.

#### 7.2 Safer working practice

- Learning Opportunities takes steps as outlined in this and other relevant policies to ensure processes
  are in place for staff that promote continuous vigilance, maintain an environment that deters and
  prevents abuse and challenges inappropriate behaviour.
- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the staff code of conduct.
- The DSL will ensure that all staff and volunteers 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. Any 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 code of conduct, online safety policy, and Acceptable Use Policies (AUPs).

#### 7.3 Supervision and support

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school 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
  - o 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.
   Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## Safer Recruitment and Allegations Against Staff - refer to relevant policies

#### 8.1 Safer recruitment and safeguarding checks

- Learning Opportunities is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.
  - Learning Opportunities will follow Part three, 'Safer recruitment' of Keeping Children Safe in Education and relevant guidance from The Disclosure and Barring Service (DBS)
  - The proprietor and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
  - The proprietor will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- Learning Opportunities are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- Where Learning Opportunities places a student with an alternative provision provider, we continue
  to be responsible for the safeguarding of that student and will need to satisfy ourselves that the
  provider can meet the needs of the student.

- We will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that our school would otherwise perform in respect of our own staff.
- Where the school organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE 2023.

## 8.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2023) and the <u>local Kent allegations arrangements</u>. In depth information can be found within our 'Managing Allegations against Staff' and staff code of conduct policy. This can be found on the shared area of the school network.
- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- 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 <u>Local Authority Designated Officer</u> (LADO) Enquiry Line and/or the <u>Education Safeguarding Service</u>.
- In all cases where allegations are made against staff or low-level concerns are reported, once
  proceedings have been concluded, the headteacher (and if they have been involved the LADO) will
  consider the facts and determine whether any lessons can be learned and if any improvements can
  be made.

#### 8.2.1 Concerns that meet the 'harm threshold'

- Learning Opportunities recognises that it is possible for any member of staff, including volunteers, proprietor, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:
  - o behaved in a way that has harmed a child, or may have harmed a child
  - o possibly committed a criminal offence against or related to a child
  - o behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Concerning behaviour outside of school should also be reported.

 Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the headteacher who will contact the <u>LADO</u> to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headteacher, staff are advised that allegations should be reported to the proprietor who will contact the LADO.

#### 8.2.2 Concerns that do not meet the 'harm threshold'

Learning Opportunities may also need to take action in response to 'low-level' concerns about staff.
 Additional information regarding low-level concerns is contained with our staff code of conduct – this
 includes what a low-level concern is, the importance of sharing them and the confidential procedure
 to follow when sharing them.

- Low-level concerns are part of a spectrum of behaviour, from inadvertent or thoughtless behaviour
  or behaviour that seems inappropriate for the circumstances, to behaviour ultimately intended to
  enable abuse.
  - o Learning Opportunities has an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
  - A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with our staff code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.
  - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns should be shared confidentially in line with our staff behaviour code of conduct to Simon Graydon (Headteacher) or where the concern relates to the Headteacher, to Lesley Buss (Proprietor). The headteacher may decide to consult with the DSL and take a more collaborative decision-making approach.
  - Where low-level concerns are reported to the school, the headteacher will be informed of all low level concerns and is the ultimate decision maker in respect of the response to all lowlevel concerns.
  - The headteacher will share concerns and liaise with the LADO enquiries officer via the <u>LADO</u> Enquiry Line.
  - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
  - If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
- Low-level concerns will be recorded by the Headteacher / Proprietor on My Concern and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
  - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
  - Where a pattern is identified, the school will implement appropriate action, for example consulting with <u>the LADO enquiry line</u> and following our disciplinary procedures.

#### 8.3 Safe Culture

- As part of our approach to safeguarding, the School 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 (including supply teachers,
  volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or

malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.

- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and
  potential failures in the school safeguarding regime. The leadership team at Learning Opportunities
  will take all concerns or allegations received seriously.
- All members of staff are made aware of the school Whistleblowing procedure which is available on Sharepoint. 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 <a href="help@nspcc.org.uk">help@nspcc.org.uk</a>.
- 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.

## 9 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 school play an essential role in helping students 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 recognises the crucial role we have to play in preventative education.
   Preventative education is most effective in the context of a whole-school approach which prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- Learning Opportunities has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- Learning Opportunities recognise that a one size fits all approach will not be appropriate for all
  children, and a more personalised or contextualised approach, tailored to the specific needs and
  vulnerabilities of individual children might be needed, for example children who are victims of abuse
  and children with SEND.

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

## 10 Physical Safety

#### 10.1 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 handling / positive behaviour management policies and are in line with the DfE 'Use of reasonable force in schools guidance.

#### 10.2 The use of premises by other organisations

 Where services or activities are provided separately by another body using the school facilities/premises, the headteacher and proprietor will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.

#### 10.3 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 and volunteers coming into school as outlined within national guidance. Visitors will be expected to sign in and out via the reception / KS3 office visitors log and to display a visitor's badge whilst on site.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The school 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.

## **Appendix 1: 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, for example, 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.

The cost-of-living crisis has made the line between material poverty and neglect an even trickier one to walk. Being in poverty is not a safeguarding issue on its own, but it does increase the risk. It's important to always report any concerns.

#### 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 2: Support Organisations**

#### Additional links can also be found in Part Two and Annex B KCSIE.

#### **NSPCC 'Report Abuse in Education' Helpline**

• <u>0800 136 663</u> or <u>help@nspcc.org.uk</u>

#### **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
- Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

#### Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: <a href="https://swgfl.org.uk/harmful-sexual-behaviour-support-service">https://swgfl.org.uk/harmful-sexual-behaviour-support-service</a>

#### Support for pupils/students

- 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: <a href="https://www.actionfraud.police.uk">www.actionfraud.police.uk</a>
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

#### **Support for Learning Disabilities**

- Respond: <u>www.respond.org.uk</u>
- Mencap: <u>www.mencap.org.uk</u>
- Council for Disabled Children: <a href="https://councilfordisabledchildren.org.uk">https://councilfordisabledchildren.org.uk</a>

#### **Contextual Safeguarding Network**

https://contextualsafeguarding.org.uk/

#### **Kent Resilience Hub**

https://kentresiliencehub.org.uk/

#### **Substance Misuse**

- We are with you (formerly Addaction): <a href="https://www.wearewithyou.org.uk/services/kent-for-young-people/">www.wearewithyou.org.uk/services/kent-for-young-people/</a>
- Talk to Frank: www.talktofrank.com

#### **Domestic Abuse**

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: <u>www.refuge.org.uk</u>
- 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: <a href="https://respectphoneline.org.uk">https://respectphoneline.org.uk</a>

#### **Criminal and Sexual Exploitation**

- National Crime Agency: <a href="https://www.nationalcrimeagency.gov.uk/who-we-are">www.nationalcrimeagency.gov.uk/who-we-are</a>
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals: <u>www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit</u>

#### **Honour Based Abuse**

- Karma Nirvana: <a href="https://karmanirvana.org.uk">https://karmanirvana.org.uk</a>
- 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: <u>www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information</u>
- The right to choose government guidance on forced marriage: <u>www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage</u>

#### Child-on-Child abuse, including bullying, sexual violence and harassment

- Rape Crisis: https://rapecrisis.org.uk
- Brook: www.brook.org.uk
- Disrespect Nobody: <u>www.disrespectnobody.co.uk</u>
- 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: <u>www.parentsprotect.co.uk</u>
- Anti-Bullving Alliance: www.anti-bullvingalliance.org.uk
- Diana Award: www.antibullvingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

#### **Online Safety**

- NCA-CEOP: <u>www.ceop.police.uk</u> and <u>www.thinkuknow.co.uk</u>
- Internet Watch Foundation (IWF): <u>www.iwf.org.uk</u>
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: <u>www.mariecollinsfoundation.org.uk</u>
- Internet Matters: <u>www.internetmatters.org</u>
- NSPCC: www.nspcc.org.uk/onlinesafety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk

- Cyber Choices: <a href="https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices">https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cybercrime/cyberchoices</a>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

#### **Mental Health**

- Mind: www.mind.org.uk
- Moodspark: <a href="https://moodspark.org.uk">https://moodspark.org.uk</a>
- Young Minds: <a href="www.youngminds.org.uk">www.youngminds.org.uk</a>
- We are with you: <a href="https://www.wearewithyou.org.uk/services/kent-for-young-people/">www.wearewithyou.org.uk/services/kent-for-young-people/</a>
- Anna Freud: www.annafreud.org/schools-and-colleges/

#### Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: <a href="www.gov.uk/report-terrorism">www.gov.uk/report-terrorism</a>
- True Vision: <u>www.report-it.org.uk</u>

#### **Children with Family Members in Prison**

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