INVICTUS

Education Trust

Ellowes Hall Sports College

Trust Policy for Safeguarding & Child Protection

Approved by Board of Trustees

Reviewed August 2021

To be reviewed on August 2022

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Policy Formulated in Consultation with:	Trustees/CEO/Headteachers/DSL's

Invictus Education Trust Safeguarding Statement

Safeguarding is everyone's responsibility and it is the duty of this Trust to safeguard and promote the welfare of children.

We focus on providing a safe and welcoming environment for all of our children, regardless of age, ability, culture race, language, religion, gender identity or sexual identity. All of our children have equal rights to support and protection.

This policy applies to all staff, volunteers and governors, all of which receive an appropriate level of training for their roles and on their safeguarding duties. We update this policy at least annually to reflect changes to law, guidance and best practice.

We work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans which provide additional support to the child.

All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in child protection or safeguarding issue will receive appropriate support.

Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among pupils and we set a good example by conducting ourselves appropriately.

Identifying safeguarding and child protection concerns often begin with recognising changes in pupils' behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Challenging behaviour may be an indicator of abuse.

All of our staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

INVICTUS Education Trust

VALUE ONE

Every day, in every way, our students come first

Our first and most important value.

To safeguard all students, staff and volunteers

To inspire each other everyday to improve everything we do

Set an aspirational culture in every stakeholder's environment

To report safeguarding concerns to HQ, please email Amy Buttery (PA to CEO) abuttery@invictus.education for the attention of Tony Bowles, CEO

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1. Purpose & Aims

The purpose of **Ellowes Hall Sports College's** Safeguarding policy is to ensure we:

- **Are committed** – to develop a robust culture of vigilance and challenge.
- **Build resilience** – by raising awareness of safeguarding and child protection issues, and equipping children with the language and skills to keep themselves safe.
- **Establish a safe environment** – in which children can learn and develop within an ethos of openness and where children are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- **Support vulnerable pupils** –who have been abused, have witnessed violence towards others or may be vulnerable to abuse.
- **Prevent unsuitable people** – from working with children by ensuring we practice safe recruitment in checking the suitability of **all** school staff, supply staff and volunteers to work with our children. And to maintain an active vigilance thereafter in line with the safeguarding culture.

Our aim is to follow the procedures set out by Dudley Safeguarding Children's Board, Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2021 by **knowing** and **understanding** that:

- Safeguarding and promoting the welfare of children is **everyone's** responsibility, and the **voice of the child** is evident.
- **Everyone** who comes into contact with children and their families has a role to play.
- **Everyone** should ensure that their approach is **child-centred** considering, at all times, what is in the **best interests of the child.**
- By establishing **a safe environment,** we **enable** our children to learn and develop within an ethos of openness.
- **No single practitioner** can have the full picture of a child's needs and circumstances
- If children and families are to receive the **right help at the right time**, **everyone** who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action
- The importance of providing children with a **balanced curriculum** including PHSE, healthy relationship education, online safety, sexting, peer on peer abuse as well as County Lines, Contextualised issues and Child Criminal Exploitation. Also supporting this with online activities, enabling them to enhance their **safeguarding** skills and knowledge whilst **understanding the risks.**
- Undertaking the role to enable children and young people at our school to have **best outcomes**.
- Ensuring that as a school we have awareness of our staff's knowledge and understanding as well as embedding safeguarding, through clear systems of

communication and Continuous Professional Development (CPD) so that safeguarding is a **robust element** of our school practice.

At **Ellowes Hall Sports College** we strive to: -

- **Protect** children and young people from maltreatment.
- **Prevent** impairment of our children and young people's mental and physical health or development.
- **Ensure** that our children and young people grow up in circumstances consistent with the provisions of safe and effective care.
- **Take action** to enable **ALL** children to have the **best outcomes**.
- **Our** culture for all staff is:
  1. **"It happens here"**
  2. **"Everyone's Responsibility, student focused"**
  3. **"We are proactively safeguarding children and they are at the centre"**

This policy provides guidance to all adults working within the school, whether paid or voluntary or directly employed by the school or a third party.

- This policy is available on our school website and is available on request from the school office. We also inform parents/carers about this policy when their children join our school.
- This policy will be reviewed in full by the Governing Body on an annual basis or sooner should legislation/guidance change.
- This policy sets out how the school's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at this school. Our policy applies to all staff; paid and unpaid, working in the school, including Governors.
- The policy is provided to all staff (including temporary staff, supply staff and volunteers) at the point of induction, alongside our Staff code of conduct.
- Our Governing Body, working with the senior leadership team and especially our Designated Safeguarding Lead, ensure that those staff who do not work directly with children read and either Part 1 or Annex A (condensed version of Part 1) of the KCSIE 2021 guidance.
- All staff who work directly with children, are provided and read Part One of Keeping Children Safe in Education 2021.
- The school follows the Dudley Safeguarding Children's Board policies and procedures.

2. Ethos

The child's welfare is of paramount importance, we are a child centred school and make all efforts possible to capture the voice of the child and to try and understand what their daily lived experiences are like.

We all have a statutory duty to safeguard and promote the welfare of children and to maintain a professional attitude of ***'it could happen here'*** where safeguarding is concerned.

Our school is committed to safeguarding children and promoting children's welfare and expects all staff, governors, volunteers, and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to **act without delay** to protect children by reporting anything that might suggest a child is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours, that underpins this commitment. The school seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.' (Keeping Children Safe in Education 2021)

All staff are encouraged to report any concerns that they have and **not see these as insignificant.** On occasions, a referral is justified by a **single incident** such as an injury or disclosure of abuse. More often however, **concerns accumulate over time** and are evidenced by building up a picture of harm; this is particularly true in cases of emotional abuse and neglect. In these circumstances, **it is crucial that staff record and pass on concerns** in accordance with this policy to allow the Designated Safeguarding Lead to build up a picture and access support for the child at the earliest opportunity**. (See Appendix 1)**

We maintain a professional attitude of '**it could happen here'** where safeguarding is concerned. When there are concerns about the welfare of a child, staff members will always act in the best interests of the child. This policy has been developed in-conjunction with our school culture of prevention, protection, and support.

Children at Ellowes Hall are reassured that they have a voice, they are listened to and what they say taken seriously. They know that they will be supported and kept safe. They are never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Children at our school are encouraged to talk freely with staff if they are worried or concerned about something and our staff understand that a victim of any type of abuse should never be made to feel ashamed for making a report.

3. Key Principles

The child's needs and welfare are paramount and we are a **child centred school.** All children have a right to be protected from abuse and neglect and have their welfare safeguarded. Children should be **listened to** and their views and wishes should inform any assessment and provision for them. Staff should always act in the **interests of the child** in order to protect them.

The school recognises that scrutiny, challenge, and supervision are key to safeguarding children.

- At **Ellowes Hall** we have a robust Safeguarding training schedule for all staff, which is monitored by the DSL. All staff receive Level 1 Safeguarding training, as required in KCSIE 2021, and receive regular updates through staff meetings, briefings, emails etc. to develop and support robust safeguarding practices amongst all staff.
- The school has **clear induction processes** for all staff, volunteers and Governors, and all required documents and policies are provided both at induction of new staff, and on a yearly refresh basis for current staff. These documents include Part 1 of KCSIE 2021. The Code of Conduct; schools conduct policy; schools' response to children who go missing from education, the role of the DSL and this Safeguarding Policy as well as peer on peer abuse and child on child sexual violence and sexual harassment.
- **All** staff will 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.
- **All** staff will be aware that safeguarding incidents and /or behaviours can be associated with factors outside the school or college and /or can occur between children outside of these environments.
- **All** staff, but especially the Designated Safeguarding Lead/ Deputies will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to, sexual exploitation, criminal exploitation and serious youth violence.
- The school is committed to working with other agencies to provide **early help** for children before they become at risk of harm or require a 'child in need' statutory assessment.
- **All** staff should be aware of the local early help process and **understand their role in it**. (KCSIE 2021). 'Early Help means providing support **as soon as a problem emerges**, at any point in a child's life, from the foundation years through to the teenage years. '(WT 2018). This includes liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.' (DfE 2018)
- **All** staff should be aware of the **process** for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments. (KCSIE 2021)
- **All** staff have equal responsibility to report their concerns about a child or the behaviour of any adult without delay to the Designated Safeguarding Lead. Whilst the Designated Safeguarding Lead will normally make referrals to Children's Services, **any staff member can refer their concerns to children's social care** directly in emergencies or if they feel they need to do so.
  https://safeguarding.dudley.gov.uk/tell-us/
  Dudley Children services 0300 555 0050
- Everyone has responsibility to **escalate their concerns** and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm.
- The school understands its responsibility to **request a statutory assessment** lead by a social worker for any child in need, as defined under the Children Act 1989, who is unlikely to achieve or maintain a satisfactory level of health or development, or their

health and development will be significantly impaired, without the provision of services.

- The school will work in **partnership with other agencies** to promote the welfare of children and protect them from harm, including the need to share information about a child to safeguard them.
- The school will **work with other agencies** to ensure any actions that are part of a multi-agency coordinated plan are completed in a timely way.
- The school will follow the Dudley Safeguarding Children's Board's procedures and provide them with information as required.
- Staff, children, and families will need support following child protection processes being followed.
- Children have a right to learn ways to keep themselves safe from harm and exploitation. We will provide opportunities for pupils/students to develop skills, concepts, attitudes, and knowledge that promote their safety and well-being.
- Safeguarding issues will be addressed through the PSHE curriculum, for example self-esteem, emotional literacy, assertiveness, power, consent, coercion, control as part of healthy relationship education (previously known as sex and relationship education SRE), online safety (formally known as e-safety), sexting and bullying (including cyber bullying)
- Relevant issues will be addressed through all areas of the curriculum.
- All our policies, which support our ethos of safeguarding, will be interlinked with this Safeguarding Policy.

4. Legislation & Guidance

Schools and colleges **must have regard** for the DfE statutory guidance **'Keeping Children Safe in Education (DfE2021).**

Keeping Children Safe in Education 2021

This guidance is read alongside

- statutory guidance Working Together to Safeguard Children
- departmental advice What to do if you are Worried a Child is being Abused-Advice for Practitioners and
- departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

All staff must read and understand **at least part 1 of Keeping Children Safe in Education 2021**

Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, **significant harm**, to enable them to decide whether they should take any action to safeguard and promote the child's welfare. There may be a need for immediate protection whilst the assessment is carried out. **(See Appendix 1)**
A **child in need** is defined under the Children Act 1989, as a child who is unlikely to achieve or maintain a satisfactory level of health or development, or their health and development

will be significantly impaired, without the provision of services; or a child who is disabled. A social worker will lead and co-ordinate any assessment under section 17 of the Children Act 1989.
Section 175 of the Education Act 2002 places a duty on local authorities (in relation to their education functions, and governing bodies of maintained schools and further education institutions, which include sixth-form colleges) **to exercise their functions** with a view to safeguarding and promoting the welfare of children who are pupils at a school, or who are students under 18 years of age attending further education institutions.

The same duty applies to independent schools (which include Academies and free schools) by virtue of regulations made under section 157 of the same Act.

5. Role & Responsibilities

Designated and Deputy Safeguarding Leads

Our Designated Safeguarding Lead is Mr J Marsh

Our Deputy Designated Safeguarding Lead is Mr D Slater.

The Designated and Deputy Safeguarding Leads (DSL and DDSL) will carry out their roles in accordance with Keeping Children Safe in Education 2021

Keeping Children Safe in Education 2021

The DSL/DDSL will undergo the appropriate Safeguarding Training to provide them with the knowledge and skills to carry out their role. This training should be updated at least every 2 years, in line with the Dudley Safeguarding Children's Board requirements.

In addition to the formal training, their knowledge and skills are refreshed at regular intervals, at least annually, through the termly Dudley Safeguarding forums, newsletters, meeting other DSL's, emails and reading statutory guidance. The training provides DSL/DDSL's with a good understanding of their own role, the processes, procedures, and responsibilities of other agencies, particularly children's social care.

The DSL continually develops an understanding of the community the school serves, the risks and resilience. This is done in collaboration with local partners such as Police and Local Youth and Support teams, and the Local Authority.

DSL/Deputy DSL will refer cases of suspected abuse to the local authority children's social care as required. They will represent School at child protection conferences and core group meetings. The DSL will be the expert within our setting to support staff in liaising with other agencies, making assessments and referrals. Any staff member maybe required to be part of strategy discussions with other interagency meetings and contribute to the assessment of child/ren

The DSL/Deputy DSL should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children 2018.

NPCC Guidance 'When to call the Police' helps designated safeguarding leads understand when they should consider calling the Police and what to expect when they do.

The DSL will refer cases to the Channel programme where there is a radicalisation concern as required, and support staff making Prevent referrals to the Channel programme.

The DSL (if the Headteacher) will refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.

The DSL will refer cases where a crime may have been committed to the Police as required.

The DSL/Deputy DSL will maintain robust systems to monitor and record training of all staff, volunteers, supply annually, refresher time scales are evident. Training is delivered in-line with KCSIE 2021 recommendations. This will include bulletins, briefings, and CPD training. Regular updates will be shared with staff.

The DSL will ensure all staff and regular visitors have training on how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information accurately. Staff/volunteers do not make promises to any child and will not keep secrets. Every child will be made aware of what the adult will have to do with any information they have chosen to disclose to a staff member/volunteer.

The DSL monitors the electronic case management systems to record concerns about children and young people ensuring that the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately. The recording and storing of information are kept in-line with the Data Protection Act 2018 and General Data Protection.

The school uses CPOMS (Child Protection Online Management System) for the management and referral process of safeguarding concerns and information.

DSL monitors the quality of safeguarding files and/or recording on electronic systems through auditing case files regularly. The DSL/DDSL should have appropriate and regular supervision within the Senior Leadership Team. Systems are compliant with General Data Protection Act.

DSL has a clear system for Child Protection (section 47), Child in Need (section 17), Early Help Assessment (EHA) files being removed from school and returned for the purposes of case review meetings, Rapid Reviews, Child Safeguarding Practice Reviews (CSPR) and DHR (Domestic Homicide Reviews).

DSL helps to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children (including children with or who have previously had a Social Worker) are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the schools and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children
DSL ensures systems are in place to induct new staff/governors is robust and monitored and non-compliance shared with Senior Leadership Team/Governance body. DSL to ensure induction policy is updated annually in-line with Keeping Children Safe in Education.

DSL ensures each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff.

DSL understands and supports the school/college with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation.

Designated Safeguarding Lead/Governing Body/Headteacher all encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school/college may put in place to protect them. DSL has developed systems to record these and ensure through case reviews the child/rens voice have been heard/recorded and they have a child-centred approach.

DSL will liaise with the Headteacher/Director or Principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

DSL notifies children's social care if a child with a child protection plan is absent for more than two days without explanation.

DSL will liaise with all staff (e.g. pastoral staff, school nurses, SEN staff and Mental Health Leads) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. The DSL acts as a source of support, advice, and expertise for staff. Risk assessments/safety plans will be completed as required and should, where appropriate, involve other agencies, these are reviewed regularly.

DSL, where a parent chooses to remove their child/ren from school to receive **EHE (Elective Home Education)**, will make arrangements to pass any safeguarding concerns **and** the safeguarding file if there is one, to the EHE Team within Dudley.

The DSL ensures the safeguarding/child protection policy is available publicly and parents know that referrals about suspected abuse or neglect, may be made and the role of our setting in this.

During term time, the DSL or DDSL is available (during school/college hours) for staff in the school or college to discuss any safeguarding concerns. As a school we have cover arrangements in place to cover any out of hours/out of term activities. This information is shared with the Local Authority.

At times, education settings, may require further assistance from interpreters to support children and families. These services will be accessed with support of the DSL.

The Trust and its Local Governing Boards

The Trust, Local Governing Boards (LGB's), CEO and Head Teacher are accountable for ensuring the effectiveness of this policy and compliance.

The Trust has a safeguarding link who is Bob Dimmock, Chair of the Trust Board.

The Governors/director have a Safeguarding Link Governor who is Mr B Caldwell.

The Local Governing body and Head Teacher have appointed Mr J Marsh as the Designated Safeguarding Lead who is part of the senior leadership team. The Governing Body will monitor this post, to ensure that the DSL has the time and resources required, to fulfil the duty.

Local Governing body and Head Teacher have identified Mr D Slater as Deputy Designated Safeguarding Leads, and they are trained to the same safeguarding standard as the DSL. The DSL can delegate activities to Deputy Designated Safeguarding Leads; however, the ultimate responsibility remains with the DSL, the lead responsibility should not be delegated. In the absence of the DSL the Deputy DSLs will take lead on safeguarding with clear direction from the Senior Leadership Team.

The DSL and DDSL job role have been added to each staff members job description. The LGB have shared the content of "Keeping Children Safe in Education" (2021) with Designated Safeguarding Lead/Deputy Designated Safeguarding Lead and are confident the individuals have the knowledge, understanding to carry out their roles appropriately. The DSL training is compliant with the Local Safeguarding Children's Board requirement.

The Local Governing body ensures that the DSL understands their responsibility in leading safeguarding and child protection across the school. This individual has the appropriate status, authority, funding, resources, training, and support to provide advice and guidance to all staff members within the school on child welfare and child protection. The DSL/Deputy DSL receives appropriate and regular supervision from senior leadership team or external services.

The Local Governing body ensure that they facilitate a whole setting approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes, policies and practice, should operate with the **best interests of the child** at their heart.

Where there is a safeguarding concern, Local Governing body ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. Systems are in place and are well promoted, explained properly and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Local Governing Body ensures that the school is **compliant with their 175/157** audit return to the Dudley Safeguarding People Partnership (DSPP). Any areas of concern in safeguarding are identified and a safeguarding action plan is developed. The Governing Body ensures the school contributes to inter-agency working in-line with Working Together to Safeguard Children (2018).

The Governing Body ensures **Safer Recruitment Procedures**, that include the requirement for appropriate checks in line with national guidance, are followed.

At Ellowes Hall we ensure that children are taught about safeguarding, including online safety, see sections further on in this policy regarding this.

- Teaching about relationships, sex and health

There is an expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.

All staff, volunteers and Governors have read and understood the code of conduct annually and Keeping Children Safe in Education 2021, **including hyperlinks**. We have developed a system, in-line with guidance, to ensure that regulated and non-regulated activities, as well as staff supervision, is understood across the school. The identification of volunteers, students, supply staff and visitors can be clearly identified by our visitor system.

The Trust and Local Governing bodies will ensure there are appropriate policies and procedures in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. These policies are updated at least annually with timely updates, if required sooner. These policies include: -

- This Safeguarding/Child Protection Policy and our whole setting culture and approach to all forms of safeguarding referencing Dudley safeguarding arrangements by safeguarding partners, as well as other policies such as peer on peer abuse/child on child sexual violence and sexual harassment, online safety and special educational needs and disabilities (SEND). We ensure that we keep up to date with safeguarding issues as they emerge and evolve, including lessons learnt.
- a restorative conduct policy including measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- a staff behaviour/code of conduct which includes acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media.
- a whistleblowing policy and staff have received a copy and had the opportunity to raise concerns. There is a culture in our setting where staff can raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with agreed whistle blowing procedures. **Whistleblowing Policy**
- appropriate safeguarding arrangements in place to respond to children who go missing from education, particularly on repeat occasions

Our Local Governing Body/Headteacher have ensured that there is a current whistle blowing policy and staff have received a copy and had the opportunity to raise concerns. There is a culture in our setting where staff can raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with agreed whistle blowing procedures. **Whistleblowing Policy**

Further guidance on whistle blowing can be found at this link. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call on 0800 028 0285 and the line is available from 8am to 8pm, Monday to Friday. Email: help@nspcc.org.uk

The Local Governing Body and Headteacher have a schedule to review policies and procedures to ensure they are current and in line with National and Local guidance.

The Local Governing Body and DSL coordinate the updates within the training schedule to support the culture of learning for all staff/volunteers.

We update parents through our school website, and through letters, where there is a specific school focus.

Designated Teacher for Looked After and previously Looked After Children

The Governing body have appointed a Designated Teacher (DT) and this teacher works with the local authority and parents/carers to promote the educational achievement of registered pupils in our setting, who are 'looked after'.

The Designated Teacher is: **Ms Flavell**

Our Designated Teacher will work across the school to promote and improve educational outcomes for children in care using evidence-based interventions. This being children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care, outside of England and Wales. They are appropriately trained and have the relevant qualifications, training, and experience. They are in a leadership role and can make decisions on behalf of the school to implement plans to support children in care.

The Designated Teacher works with the Virtual school, to provide the most appropriate support, utilising the pupil premium plus, to ensure that they meet the needs identified in the child's personal education plan (PEP). They also work with the virtual school head, to promote the educational achievement of previously looked after children.

Our school will admit any children in care without delay and work restoratively avoid exclusions for our most vulnerable children. We will make reasonable adjustments to our Behaviour Policy to support children in care and contact the Virtual School when a child is at risk of exclusion. Where a short period of exclusion is unavoidable, we will provide 1st day provision.

Care Leavers: - The Designated Teacher has the details of the Local Authority Personal Advisor who has been appointed to guide and support the care leaver and liaises as necessary regarding any issues of concern affecting the care leaver.

6. Working With Parents/Carers

We are committed to working in partnership with parents/carers to safeguard and promote the welfare of their children, and to support them to understand our statutory responsibilities in this area. The school follows legislation that aims to act in the best interests of the child.

When new pupils join our school, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the school website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to the relevant local authority or other agencies.

We are committed to working with parents in a positive, open and transparent way. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard a child from harm.

We will seek to share with parents/carers any concerns we may have about their child before making a referral, unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the Designated Safeguarding Lead making a referral to the relevant local authority in those circumstances where it is appropriate to do so.

To keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above) and **at least 2 contacts.**
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).
- Any legal or criminal changes which effects parental responsibility e.g. bail condition, court orders, Multi Agency Risk Assessment Conference (MARAC).

The School will retain this information on the pupil file. The school will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the school has been supplied with the adult's full details in writing.

7. Dudley EARLY HELP

Dudley's Thresholds and Early Help
If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
Level 1 - No referral is required. Professionals should contact Dudley's Family information Service on 01384 814398 to obtain information about support available for children, young people and families.

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

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

View more information on Dudley Early Help.

https://safeguarding.dudley.gov.uk/safeguarding/child/work-with-children-young-people/dudley-early-help

8. What Happens After A Referral Is Deemed Necessary To Escalate Beyond Early Help.

Child in Need (Section 17)

If the DSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, they will speak with parents/child and obtain their consent for referral to Dudley Childrens Advice and Support or the appropriate social care team if a different authority, to request an assessment. If parents refuse to give consent, but the child's needs are not being met, the DSL will discuss these issues with the Dudley Childrens Advice and Support. Appropriate school staff should be invited to participate in Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require Section 17 services.

Child Protection (Section 47)

If the local authority have reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, they have a duty to make enquires under Section 47 to enable them to decide whether they should take any action to safeguard and promote the child's welfare.

This duty also applies if a child is subject to an emergency protection order (under section 44 of the Children Act 1989) or in police protective custody under section 46 of the Children Act 1989.

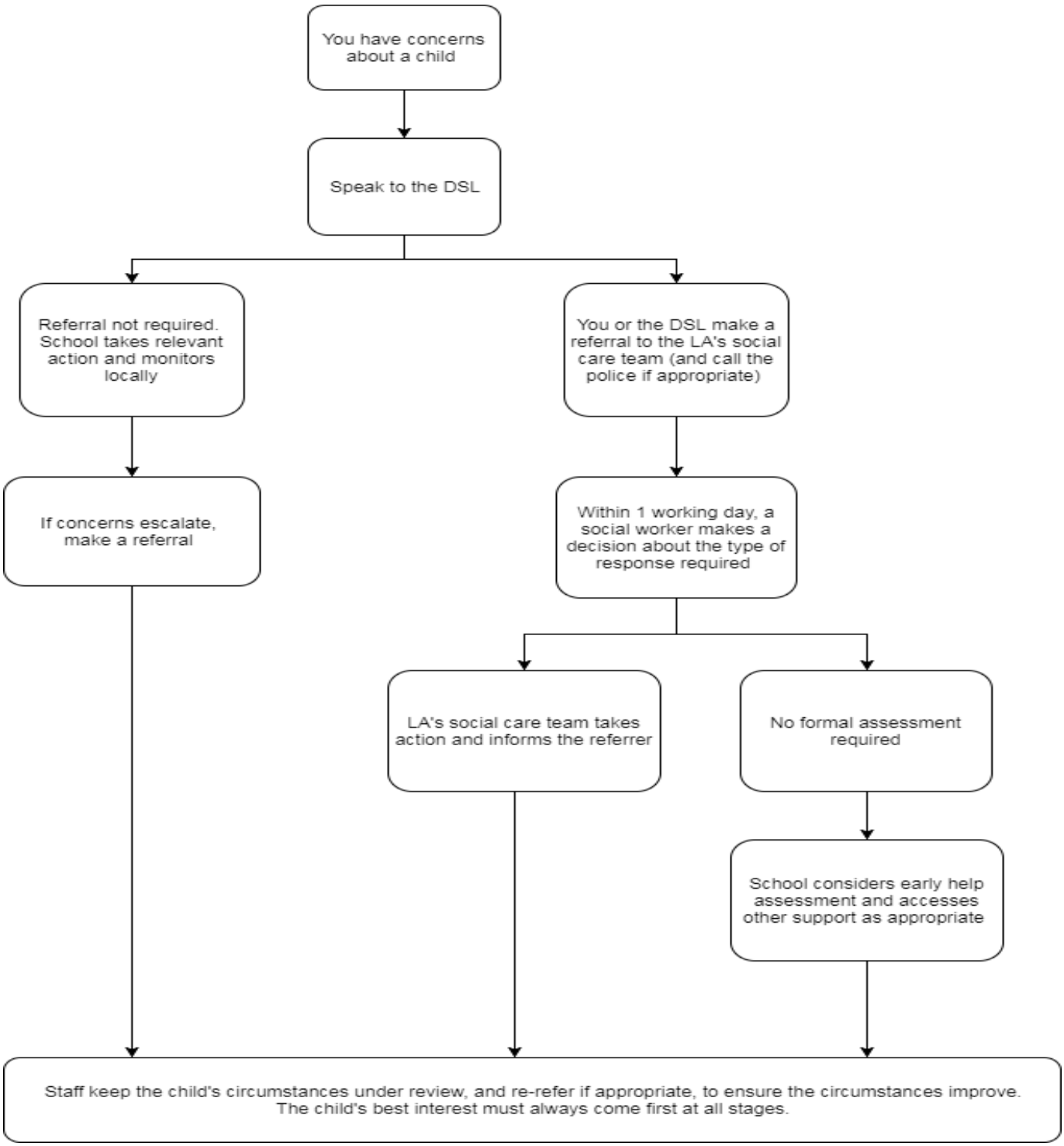
Children's Services will convene an Initial Child Protection Conference (ICPC) once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference (RCPC) will take place once a child has been made the subject of a Child Protection Plan to monitor the safety of the child and the required reduction in risk. Between conferences regular meetings of a core group will take place to monitor the progress of the child protection plan.

The DSL, and sometimes other staff members, will attend a child protection conference on behalf of the school in respect of individual children.
The person attending will have as much relevant and up to date information/case files about the child as possible; any member of staff will be required to contribute to this process. The person attending will contribute to a recommendation on the risks/protective factors for the family from their information and a view on the need for a child protection plan. If we cannot attend, then we ensure that a report is sent prior to the conference.

Clearly child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in

an open, honest, and transparent way with any parent whose child has been referred to Dudley Childrens Advice and Support or whose child is subject to a child protection plan.

Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents/carers.



9. Escalation Procedure

Dudley Safeguarding Children Board expects members of staff working directly with families to share information appropriately and work to plans agreed in all relevant forums. Good practice includes the expectation that constructive challenge amongst colleagues within agencies and between agencies provides a healthy approach to the work.

If we believe that concerns regarding a child are not being addressed, we understand the expectations that we will commence the escalation process be used until a satisfactory conclusion is reached.

The process of resolution will be kept as simple as possible and the aim will be to resolve difficulties at a professional practitioner level, wherever possible and always in a restorative way. We recognise that differences in status and experience may affect the confidence of some workers to pursue this course of action, and support should be sought from the DSL.

10. A Safer School Culture

Safer Recruitment and Selection

We pay full regard to 'Keeping Children Safe in Education 2021'. Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity (best practice being birth certificate), checking academic or vocational qualifications, obtaining professional and character references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks, prohibition checks whether they are known to the police and/or social care, if they have been disqualified from providing childcare and any relevant overseas information. Evidence of these checks is recorded on our Single Central Record.

Staff who have lived or worked outside the UK **will** undergo the same checks as all other staff, even if they have never been to the UK. We will ensure that any other appropriate checks are carried out so that any relevant events that occurred outside the UK can be considered. These checks could include criminal records checks for overseas applicants and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.

Guidance: Application process for criminal records checks overseas
Regulated professions database
UK Centre for Professional Qualifications

Separate barred list checks are only be carried out in the following circumstances:

- for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 213 have been carried out); or,

- where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as above have been carried out).

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils.
All Senior leaders and governors will undertake appropriate training in Safer Recruitment.

One of the above will be involved in **all** staff and volunteer recruitment processes and sit on the recruitment panel.

Induction

All staff must be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. This should include:

- The child protection policy.
- The behaviour policy.
- Peer on Peer/Child on Child Sexual Violence & Sexual Harassment policy.
- The staff behaviour policy (sometimes called a code of conduct).
- The safeguarding response to children who go missing from education; and
- The role of the DSL (including the identity of the DSL and any deputies).
- At least part one of KCSIE 2021.

If staff, supply staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open. No visitors, volunteers or parent helpers are ever to be left unsupervised with children or out of sight of the teacher or member of staff in charge. It is the responsibility of the member of staff to ensure this is the case.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Staff Support

We recognise the stressful and traumatic nature of safeguarding and child protection work. We will support staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate.

Regular supervision will be offered to the Lead DSL within school, at least half-termly and may be extended to other members of staff, as deemed appropriate by the school.

Use of reasonable force

There are circumstances when it is appropriate for staff in school to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Departmental advice for schools is available here.

When using reasonable force in response to risks presented by incidents involving children including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully.

By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers, we will reduce the occurrence of challenging behaviour and the need to use reasonable force.

11. Keeping Children Safe In Education 2021-Specific Safeguarding Issues.

All staff in Ellowes Hall have an awareness of the following safeguarding issues through regular training and briefings. Staff are aware that these behaviours can make children vulnerable and put them in danger: All staff know who the Designated Safeguarding Lead is within our School and as well as being the expert in this filed, is there to support staff, volunteers and Governance body further.

- Abuse
- Behaviours linked to safeguarding issues
- Children and the courts system
- Children with family members in prison
- Children missing from education
- Child missing from home or care
- Child Criminal Exploitation (CCE)
- Child sexual exploitation (CSE)
- County Lines
- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Homelessness
- Mental health
- Missing children and adult's strategy

- Online safety
- Peer on peer abuse/child on child abuse
- Private fostering
- Preventing radicalisation
- Prevent Duty and Channel
- Serious violence
- Sexual violence and sexual harassment
- Sexting - Sharing of nude/semi-nude images
- Trafficking
- Upskirting

Behaviours linked to safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Presenting behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Other safeguarding issues that all staff should be aware of include:

Children Missing Education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveler families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

For further information: Children Missing Education statutory guidance for local authorities 2016
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

Attendance Flow Chart procedure CME

This is the action taken when no communication is received from parents/carers etc

Day 1 - of absence and every day afterwards – text sent to parent advising of absence and asking to ring school

Day 2 - ring all contacts

Day 4 -6 would request, wherever possible that a home visit is made

Day 6 – send letter out to invite parents in for meeting with HOY/AFR/HES on what would be day 10.

Day 10 – meeting day - if parent/carer is no show and we have still not received any communication or the student has not returned to school then an EIS referral is made as a CME

Child Missing from Home or Care

There are strong links between children involved in criminal and sexual exploitation and other behaviours such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse.

In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children.
Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Guidance document

- Children who run away or go missing from home or care

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

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.

School will attend and support local MACE meetings to ensure local information is shared and received for the better outcomes of the child.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm, from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.

• children who suffer from changes in emotional well-being.

• children who misuse drugs and alcohol.

• children who go missing for periods of time or regularly come home late.

• children who regularly miss school or education or do not take part in education.

Guidance documents:

- Safeguarding children who may have been trafficked

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. 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. This includes 16- and 17-year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girlfriends and/or suffering from sexually transmitted infections/becoming pregnant.

Guidance documents:

- Child Sexual Exploitation Definition & Guidance
- Know about CSE

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes, and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid

detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRF) should be considered. Further information can be found here National Referral Mechanism.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation: -

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Guidance Document:

- Criminal Exploitation of Children and Vulnerable Adults; County Lines

Domestic Abuse

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life. We will signpost and support our children/ young people.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. West Midlands police forces are part of Operation Encompass

The DSL will provide support according to the child's needs and update records about their circumstances.

For help and support call Dudley safe and sound on 01384 455411, text or WhatsApp 07384466181.

In an emergency dial 999, if too dangerous to talk press 55 when connected to an operator. If you believe a child is a victim of domestic abuse please call 03005550050

Guidance Documents:

- Domestic Violence and Abuse
- NSPCC-Domestic Abuse

Drugs

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation.

Guidance Documents:

- NSPCC-Parental Substance Misuse
- Drugs Advise for Schools

Fabricated or Induced Illness (FII)

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause. There may be several explanations for these circumstances, and each requires careful consideration and review. Concerns about a child's health should be discussed with a health professional who is involved with the child.
Guidance Documents:

- Safeguarding children in whom illness is fabricated or induced

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority, so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should

not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Our staff will consider homelessness in the context of children who live with their families, and intervention will be on that basis. However, it is also recognised that in some cases 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and they will require a different level of intervention and support.

Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

Honour-based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.
It is important to be aware of this dynamic and additional risk factors, when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM is known by several names including "cutting", "female circumcision" or "initiation". The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to "honour-based abuse".

FGM mandatory reporting duty for 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 along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It is rare to see visual evidence, and children should not be examined but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Staff **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is good reason not to, they should still consider

and discuss any such case with the DSL (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where staff do not discover that FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff will follow local safeguarding procedures.

Guidance Documents: -

- Multi Agency Statutory guidance on Female Genital Mutilation
- Female Genital Mutilation Act 2003

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one, entered, **without** the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. The threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some perpetrators use perceived culture practices, to coerce a person into marriage. Schools and colleges play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person's parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life'. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

Guidance Document:

- Forced Marriage
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

Mental Health

All staff have an incredibly important role to play in supporting the mental health and wellbeing of our pupils and **are** aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

At Ellowes Hall we have a clear Mental Health strategy. We also have several members of staff who have their Mental health first aid training.
Amy Toro-Pearce is the schools Mental Health Lead.
Ms C Flavell, Mr J Horton and Miss V Phillips are also mental health first aiders

Positive mental health is promoted through the PSHE programme and tutor programme as well as regular sessions led by the Pastoral team.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, 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.
Where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Guidance and helpful documents: -

- Addressing Trauma and Adversity
- Mental Health and Behaviour in Schools Guidance.
- Preventing and tackling bullying
- Every Interaction Matters
- Education recovery
- MIND-Parenting Capacity and Mental Health
- NSPCC-Mental Health and Parenting

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and by speaking to the designated safeguarding lead or a deputy.
Our mental health strategy can be found on our Safeguarding page.

Online Safety

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sexual predation, and technology often provides the platform that facilitates harm.

We realise that it is essential for our children to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole school/college approach to online safety which empowers us to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate.

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

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

- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have filters and monitoring systems in place, and these are regulated, and risk assessed as part of the prevent duty.

We have an online safety policy which identifies the usage and expected behaviour of children/students. As a school we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding.

Education at home/Remote learning: - Where children are being asked to learn online at home, our school will refer to and use the links and resources provided by the DfE; Safeguarding in schools, colleges and other providers and Safeguarding in remote education.

The Trust's schools implement a robust monitoring and filtering regime that has been specifically tailored to cover all desktop, portable, and personal devices used within the school environment.

For desktop computers, all Internet access – including viewing web pages and sending e-mails - is passed through an exhaustive filtering system known as 'e2guardian'. This system not only picks up on keywords and phrases when deciding on whether to allow students and staff to view content, but also uses comprehensive blacklists that are constantly updated by other schools and organisations. It can see through 'encrypted' Internet connections and still enforce its filtering and monitoring, preventing users from bypassing it. This makes it a highly intelligent and effective filtering system, and strikes a good balance between protecting students and staff from inappropriate content, and not unnecessarily restricting their use of ICT. The system is necessarily passive and does not require the input of school staff, but appropriate staff are able to tweak the filtering process where it is being overly restrictive. All Internet access by staff and students on desktop computers is automatically monitored and recorded, and logs of student and staff activity can be recalled at any time. In addition, the Trust's 'Invictus System Management' tool keeps track of all content that has been filtered, and can flag those users that have a high proportion of filtered content for further investigation. Social media use by students is highly restricted on school desktop computers, and is closely monitored for staff users.

The Trust's e2guardian system is not only set up to filter obvious categories such as adult content, gambling, and social networking, but is also set up with keywords for grooming, bullying, and PREVENT. The emphasis of the system is on passive filtering, such that the content is simply never delivered to users, rather than relying on staff members to react to it afterwards.

The IT team will immediately refer concerns to the relevant school's DSL, with all relevant evidence provided, for handling according to that school's processes.

For portable and personal devices, all of our schools offer free, fast Wifi, and students and staff are encouraged to use it. This encouragement is specifically to discourage students and staff from using their own 3G or 4G connections, thereby keeping use of their personal devices within our network 'walled garden'. Once users connect their devices to the Wifi they are required to log on with their school credentials, and are then subjected to the same e2guardian filtering and monitoring that is present on our desktop computers. All filtered content is logged to the same system that is used by our desktop computers. By providing free Wifi and thereby discouraging 3G and 4G use on mobile phones and tablets, we can drastically reduce the safeguarding risks that come with personal devices. Students connecting their devices to the free Wifi will see that any social media apps will be highly restricted, and that inappropriate content simply cannot be accessed.

Outside of school, the Trust obviously has a limited technical ability to monitor the use of ICT by students and staff, however all users are required to use the Remote Desktop system when undertaking any school-related activities. When a user logs onto Remote Desktop from home, they are subjected to the same e2guardian filtering and monitoring that they would be in school.

Use of the Trust's e-mail system is highly audited, with the system recording all e-mails sent and received, and recording all activity performed by users. The Trust is able to perform 'compliance searches' on all mailboxes to identify inappropriate content or activity.

Guidance Documents:

- Children's Commissioner-Online Safety
- Teaching online safety in education settings
- Appropriate Filtering and Monitoring
- CEOP-Safety Centre
- National Cyber Security Centre
- NSPCC-Undertaking remote teaching safely
- PHSE-Advice on addressing coronavirus (COVID-19)
- 360 Degree Safe - Online Safety Review Tool
- UKCCIS-UK Council for Child Internet Safety

Peer on peer abuse (including Child on Child Sexual Violence and Sexual Harassment)

All staff have the knowledge and awareness that children can and sometimes do abuse other children (often referred to as peer on peer abuse).

We have a specific and separate Peer on Peer Abuse Policy which includes Sexual Violence and Sexual Harassment between children, as well as an Positive Conduct policy to guide, inform and support children, staff and parents/carers.

Peer on peer abuse including sexual violence and sexual harassment can occur between two children of **any** age and sex. It can occur with a single child or group of children. This can happen both inside and outside of our setting including online.
Children who are victims of peer on peer abuse including sexual violence and sexual harassment will find the experience stressful and distressing. This is likely to have an adverse effect their educational attainment. This type of abuse can exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

All staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports of it. They understand the importance of the **timely** challenge of inappropriate behaviours between peers, many listed below, that are abusive in nature. They are aware of the importance of: -

- Making clear that peer on peer abuse including sexual violence and sexual harassment is not acceptable and that that we have a zero-tolerance approach.
- Not dismissing peer on per abuse (incl sexual violence or sexual harassment) as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults e.g. grabbing bottoms, breasts, and genitalia, flicking bras and the lifting up of skirts.

The following steps are taken in school –

Peer on peer abuse - Taking appropriate action

Log of Sexual harassment/comment
Homophobic comments
Bullying incidents
Racial incidents reported

Students reprimanded at the source of comment - **removed from lesson** HOD/SLT. Teacher support / on call.

↓

Referred to HOY for follow up –

HOY

↓

Referred to the Sunflower centre for a day of restorative work and reflection room time. (in some cases, will need more severe sanction depending on incident.)

↓

Recorded appropriately - RFL / INC FTE

Parents informed.

Repeat offenders monitored and further work completed – outside agency support / intense Inclusion work.

All logs of sexual harassment/comments violence reported via CPOMS as per safeguarding policy and followed up by DSL appropriately.

All staff know that if we do not challenge and support our children that this will lead to a **culture** of unacceptable behaviours, an unsafe environment for children and in worst case

scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

We strive for a culture where children feel safe to speak to staff about their experiences. We know that the initial response to a report from a child is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe. We never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. We reassure victims that they should not feel ashamed for making a report.

We have well promoted and easily understood systems in place so that our children feel confident to knowing their concerns will be treated seriously. Any reports of peer on peer abuse will be documented and placed on the students CPOMS file. Appropriate action will then be taken in line with our Peer on Peer abuse policy and taking appropriate action steps.

All victims are taken seriously and offered appropriate support. Staff are aware of the groups that are potentially more at risk as evidence shows that girls, children with SEND and LGBT children are at greater risk. The DfE states 'peer on peer abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Victims of peer on peer abuse will be supported by the school's pastoral system and referred to specialist agencies if appropriate. Risk assessment and/or safety planning are an integral part of this support plan, particularly regarding the post incident management.

All staff understand, that even if there are no reports in our setting, this does not mean that it is not happening, it may be the case that it is just not being reported. As such it is important that if staff have any concerns regarding peer on peer abuse, they speak to their Designated Safeguarding Lead (DSL) or deputy (DDSL). Our staff will not develop high thresholds before acting.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as 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 and may include an online element which facilitates, threatens and/or encourages sexual violence. 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.
- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.

- 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) Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
- upskirting, 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; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff **are** clear as to the school's or college's policy and procedures with regards to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

If staff have a concern about a child or a child makes a report to them, they will follow the safeguarding referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy). Schools behaviour policy will support any sanctions.

Pedmore have a clear education programme in place through assemblies, PSHE programme and pastoral interventions to ensure students are aware of peer on peer abuse.

Guidance Documents:

- Disrespect NoBody
- CEOP-Safety centre
- UKCIS Guidance: Sharing Nudes and Semi-Nudes
- Sexual violence and sexual harassment between children in schools and colleges (publishing.service.gov.uk)
- Review of sexual abuse in schools and colleges - GOV.UK (www.gov.uk)
- Searching, screening and confiscation (publishing.service.gov.uk)
- Sharing Nudes and Semi-Nudes Advice

Bullying, including Cyberbullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (e.g. hitting, kicking, theft)
- Verbal (e.g. racist or homophobic remarks, threats, name-calling)
- Emotional (e.g. isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying (including sexting)

Guidance on bullying can be Preventing & tackling bullying
Cyberbullying advice

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.
People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a school away from their home area.

Our staff will notify the DSL/DDSL when they become aware of a private fostering arrangement. There is a mandatory duty on the school to inform Dudley Childrens Social Care of a private fostering arrangement by contacting (0300 5552345), who then have a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Guidance Document:

- Children Act 1989 – Private Fostering

Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to

intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

We value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Pupils/students and school staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation.
The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in **Appendix 4**.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

Prevent Duty and Channel

Prevent

The school governors, the Head Teacher/Principal and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, SEND policy, Assembly Policy, the use of school premises by external agencies, integration of students by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

All schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty and is part of our schools wider safeguarding obligations.

Designated safeguarding leads and other senior leaders familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and covers childcare). We follow the guidance in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Our School will monitor online activity within the school to ensure that inappropriate sites are not accessed by students or staff identified in our online safety section of the policy.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity.

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.
- Schools have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Guidance Documents:

- The Prevent Duty.
- Educate Against Hate
- ACT Early | Prevent radicalisation

Serious Violence

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

permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Guidance documents:

- Home Office Preventing Youth Violence and Gang Involvement
- Criminal Exploitation of Children and Vulnerable Adults; County Lines
- See Sexual Violence and Sexual Harassment between children in schools and colleges and Part Five of KCSiE 2021

12. Vulnerable Children

We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate responses are in place for children who are **absent from school** or **who go missing from education**. We will inform the local authority of any pupil who fails to attend school regularly, or who has been absent without school permission for a continuous period of **10 school days or more**.

As a school we are aware of the potential for children with SEN to have **additional barriers when it comes to safeguarding**, the school recognises that this group can be more vulnerable to abuse and neglect. Disabled children may be **especially vulnerable to abuse** because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it **difficult to tell** others what is happening.

Heightened vulnerability linked to:

- Communications skills
- Maturity (Lower cognitive ability)
- Perceptions of intent from others
- Lower self-esteem/confidence
- Potential to trust unreservedly
- A need to have "friends" or find a partner
- Differing boundaries
- Online safety – digital technology understanding

A **combination** of these factors can make them more susceptible to risks.

Children develop and mature at different rates, so what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect, so you should also be alert to parent/child interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol, if there is a sudden change in their mental health or if domestic abuse is present. By **understanding the warning signs**, you can respond to problems as early as possible and provide the right support and services for the child and their family.

Children say they need:

- **Vigilance**: to have adults notice when things are troubling them
- **Understanding and action**: to be heard and understood; and to have that understanding acted upon.
- **Stability**: to be able to develop an on-going stable relationship of trust with those helping them.

- **Respect**: to be treated with the expectation that they are competent, rather than not.
- **Information and engagement**: to be informed about and involved in procedures, decisions, concerns and plans.
- **Explanation**: to be informed of the outcome of assessments, decisions and how they have been reached, positive or negative.
- **Support:** to be provided with support in their own right as well as a member of their family.
- **Advocacy**: to be provided with advocacy, to assist them in putting forward their views.

Alternative Provision

At Ellowes Hall we know that the cohort of pupils in our provision may have complex needs, our Governing bodies are aware of this additional risk of harm that their pupils may be vulnerable to.

Guidance

- https://www.gov.uk/government/publications/alternative-provision

- https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-school

Children potentially at greater risk of harm-Children who need a social worker (Child in Need & Child Protection Plans)

Our DSL/DDSL are aware that some children may need a social worker due to safeguarding or welfare needs. Local authorities should share the fact that a child has a social worker. Children may need this help due to abuse, neglect and complex family circumstances.

We know that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. The DSL will hold and use information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services.) We will strengthen provision to reduce absence and exclusions for this group as we recognise that regular attendance is important for vulnerable pupils and school can act as a protective factor.

We will work as a school to narrow the attainment gap, have high aspirations for all children with a social worker and will design our Pupil Premium strategy to meet the needs of CWSW (Children with a social worker).

We will ensure that they benefit from additional support to recover from the impact of COVID-19 using a strength-based approach with the child's voice central to our planning. (e.g. National Tutoring Programme/Recovery Premium)

The Mental Health Lead in school will work to assess, understand, and meet the Social Emotional & Mental Health needs of Children with a social worker, as we recognise, they are more likely to experience issues than their peers.

CIC – Children in Care

All Local Authorities are advised to support the raising of the educational attainment and achievement of their Looked After Children through the overarching support of the Virtual School. The responsibility for each child's education, target setting, learning, and teaching remains with the schools where they are enrolled.
Dudley's Virtual School for Looked After Children provides a support and challenge role for schools and Local Authority teams. This is in the form of staffing support; access to additional resources to enable the support of educational outcomes; information, advice and guidance (especially around Personal Education Plans); monitoring and tracking of educational outcomes and targets, and training and support at key transitional moments

Name of LAC designated teacher: - Ms Flavell

The governing body must ensure that the designated teacher undertakes the appropriate training (section 20(2) of the 2008 Act).

The role of the designated teacher for LAC within the school

The designated teacher plays a crucial role leading the responsibility for helping school staff understand how things affect how looked after children learn and achieve.

The designated teacher will:

- Promote a culture of high expectations and aspirations for how looked after children learn
- Make sure the young person has a voice in setting learning targets.
  Be a source of advice for staff about differentiated teaching strategies appropriate for individual children and in making full use of Assessment for Learning.
- Make sure that looked after children are prioritised in one-to-one tuition arrangements and that carers understand the importance of supporting learning at home.
- Has the lead responsibility for the development and implementation of the child's personal education plan (PEP) within the school.

Guidance Document:

- Designated Teacher for Looked After Children

Children potentially at greater risk of harm

Children who need a social worker (Child in Need & Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of

adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

13. Educational Visitors To School

We will undertake risk assessment and use professional judgement and experience when deciding whether to seek an enhanced DBS for any volunteer not engaging in regulated activity. In doing so we will consider:

- What we know about the individual/company, including formal and informal information offered by staff, parents, other establishments, or volunteers.
- Whether the individual/company has other employment or undertakes voluntary activities where references can be advised, and suitability recorded.
- Whether the role is eligible for an enhanced DBS check
- We will clearly have decided the level of supervision required through risk assessment – the supervision will be "reasonable in all the circumstances to ensure the protection of children" as stated in KCSIE 2021

We have clear visitor's procedure that enables us to offer pupil experiences of meeting other professionals to extend knowledge and curriculum. This clearly states whether they are supervised or unsupervised within the school.

14. Managing Allegations Against All Staff, Including Supply Staff, Volunteers And Contractors

Our aim is to provide a safe and supportive environment securing wellbeing and best possible outcomes for the children at Ellowes Hall**.** We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

The Governing Body ensures that there are procedures in place for dealing with the two sections covering two levels (see below) of concern and/or allegations against staff members, supply staff, volunteers, and contractors.

- Allegations that may meet the harms threshold.

- Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'.

Allegations that may meet the harms threshold

We follow KCSIE 2021 guidance where it is alleged that anyone working in our education setting providing education for children under 18 years of age, including supply teachers, volunteers and contractors has:

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

This relates to members of staff, supply staff, volunteers, and contractors, who are currently working in any education setting, regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police.

Where we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Our Governing body/proprietor will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

We take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. We ensure that the procedures outlined in *Dudley Safeguarding Children's People Partnership: Managing Allegations against staff DSPP Managing Allegations and role of LADO* and Part 4 of *'Keeping Children Safe in Education'*, DfE (2021) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO).

If an allegation is made or information is received about an adult who works at Ellowes Hall which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Head teacher/Principal immediately. If it is about the sole proprietor of the Independent school, then this needs to be raised with the Designated Officer. Should an allegation be made against the Head teacher/Principal, this will be reported to the Chair of the Governing Body/management Committee.

If neither the Headteacher nor Chair of Governing Body is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Headteacher or the Vice Chair of Governors.

The Headteacher or Chair of Governors will seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'.

We are aware that concerns may arise in several ways and from several sources, for example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of our setting; or as a result of vetting checks undertaken.

We have the appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children. As part of our whole school approach to safeguarding, we promote an open and transparent culture in which **all** concerns about **all** adults working in or on behalf of our setting (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

We have created a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, and this is critical. We encourage an open and transparent culture; enabling us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of Ellowes Hall are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. Low level concern is still a concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children.
- having favourites.
- taking photographs of children on their mobile phone.
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating, or offensive language.

We understand how crucial it is that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our setting from potential false allegations or misunderstandings.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Head teacher or Chair of Governors should contact the LADO directly.

LADO service contact details:
For Yvonne Nelson-Brown – 01384 813110
For Valerie Wilmot – 01384 813164
General line: 01384 813061

The School has a legal duty to refer to the Disclosure and Barring Service 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 and/or HR. The DSL has a responsibility to inform Barring service.

15. Information Sharing

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies in line with Working Together to Safeguard Children (2018).
Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.
As part of meeting a child's needs, our **Governing body** recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place to set out clearly the processes and principles for sharing information within our setting and with the three safeguarding partners, other organisations, agencies, and practitioners as required.

We are 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, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

Our **Governing body** are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Our **Governing body** ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.
Where children leave our school/academy/college, the DSL will ensure that any relevant Child Protection file is transferred to the new setting as soon as possible, ensuring secure transit, with confirmation of receipt.

In addition to the child protection file, our DSL will also consider if it would be appropriate to share any information with the new school/college in advance of the child leaving. For example, information that would allow the new setting to continue supporting the victims of abuse and have that support in place for when the child arrives.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Guidance documents:

- Data Protection: Toolkit for schools

16. Managing Complaints

As a school we encourage children and families to raise compliments, concerns or comments and have a robust internal investigation process.

The compliment, comment, or complaint policy states clearly the stages of complaints and where to escalate concerns following completion of process either through Ofsted or EFSA. Our complaints policy is on our school website for parents/carers to access.

Safeguarding concerns should be raised with school immediately. All visitors are given safeguarding information via a handout in the main office which outlines how to share concerns and code of conduct expected by visitors/contractors. **Complaints Policy**

17. Site Security

At Ellowes Hall we provide a secure site which is controlled by precise management directives, but the site is only as secure as the people who use it. All people on the site must adhere to the rules which govern it. Laxity can cause potential problems with safeguarding, therefore: -

- Gates are kept closed during the school day; visitors gain access through the main entrance.
- Visitors, volunteers, and students must only enter through the main entrance and after signing in at the office will be issued with a school lanyard or visitor's pass. School has a clear system of ensuring staff are accompanied / supervised by regulated staff member. Any visitor on site who is not identifiable by a visitor's pass will be challenged by any staff member and this will be reported to a member of the Senior Leadership Team.
- Parents, carers, and grandparents attending functions have access only through the designated and supervised entrances, with tickets for visitors for appropriate school events.
- Children will only be allowed home with adults with parental responsibility or confirmed permission.
- Empty classrooms should have closed windows and doors.
- Children should never be allowed to leave school alone during school hours unless collected by an adult such as a parent who is doing so for a valid reason. They should report to the office to do this.
- At least five members of staff are always on duty at break times.
- A health and safety audit is completed annually with risk assessment/safety planning and will form part of Governors annual report. This will include a fire evacuation and invacuation Prevent risk assessment.
- The risk management of site security is managed by senior leadership/governance, we have a clear system of risk assessments and review timescales of these.

18. Key Legislation

This policy has been devised in accordance with the following legislation and guidance:

- Working Together to Safeguard Children 2018 (DfE)
- Keeping Children Safe in Education 2021
- Disqualification under the Child Care Act 2006
- Information Sharing Advice for practitioners providing safeguarding services
- The Children Act 1989 and 2004
- Education Act 2002
- What to do if you're worried a child is being abused
- Whistle Blowing policy
- Statutory policies for schools
- Visa – Immigration/Asylum
- Children's commissioner

19. School Policies

To underpin the values and ethos of our school and our intent to ensure that pupils at our school are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Positive Conduct Policy
- Anti-Bullying Policy
- Staff Code of Conduct
- Whistleblowing
- CIC/LAC Policy
- Peer on Peer Abuse Policy
- Online Safety
- SEND policy
- Recruitment Policy

Appendix 1

Definitions and Indicators of Abuse

1. Neglect

Neglect is 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 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 caregivers); 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 following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect
- Affluent neglect

2. Physical Abuse

Physical abuse 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.
The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.

- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or
- Isolation from peers.

3. Sexual Abuse

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 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.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.
- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

4. Exploitation

Child Sexual Exploitation occurs when a child or young person, or another person, receives "something" (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to Dudley Childrens Social Care. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity).
- Entering and/or leaving vehicles driven by unknown adults.
- Possessing unexplained amounts of money, expensive clothes or other items.
- Frequenting areas known for risky activities.
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast-food outlets.
- Missing for periods of time (CSE and County Lines)

5. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the 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 also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), 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.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug, or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.

- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as "traumatic mutism") can indicate maltreatment.

6. Responses from Parents/Carers

Research and experience indicate that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb).
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the child.
- Unrealistic expectations or constant complaints about the child.
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the child from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

7. Disabled Children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child.
- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food, or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child's means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

Appendix 2

Dealing with a Disclosure of Abuse

When a pupil tells me about abuse, they have suffered, what should I remember?

- Stay calm
- Do not communicate shock, anger, or embarrassment
- Reassure the child and tell them that you are pleased that they are speaking to you
- Never agree or promise to keep it a secret. Assure them that you will try to help but let the child know that you will have to tell other people to do this and state who this will be and why.
- Tell them that you believe them. Children very rarely lie about abuse; but they may have tried to tell others and not been heard or believed.
- Tell the child that it is not their fault
- Encourage the child to talk but do not ask "leading questions" or press for information
- Use the acronym **T.E.D**: **T**ell me. **E**xplain. **D**escribe
- Listen and remember to check that you have understood correctly what the child is trying to tell you
- Communicate that they have a right to be safe and protected
- It is inappropriate to make any comments about the alleged offender
- Be aware that the child may retract what they have told you. It is essential to record in writing, all you have heard, though not necessarily at the time of the disclosure.
- At the end of the conversation, tell the child again who you are going to tell and why it is that person or people who need to know
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions that you may have asked. Do not add any opinions or interpretations. (dates, times, names mentioned and to whom the information was passed need to be clearly recorded).
- Use the schools written/electronic recording forms
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing in as much detail as possible

The information should then be passed, in a timely way, to the DSL/DDSL and immediately if the child discloses any abuse they have suffered or may be at risk of suffering.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children's Social Care. Referrals should be made by completing a Multi-Agency Referral Form (or MARF) and returning it to MASH_Referrals@dudley.gov.uk or contact 0300 555 0050.

Appendix 3

Allegations about a Member of Staff (Incl. supply), Governor or Volunteer

1. Inappropriate behaviour by staff/supply staff/volunteers could take the following forms:

- **Physical**
  For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.
- **Emotional**
  For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability, or sexuality.
- **Sexual**
  For example, sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault, and rape.
- **Neglect**
  For example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.
- **Spiritual Abuse**
  For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

2. If a child makes an allegation about a member of staff, supply staff, Governor, visitor or volunteer the Headteacher/Principal must be informed immediately. The Headteacher/Principal must carry out an urgent initial consideration to establish whether there is substance to the allegation. The Headteacher or Principal should not carry out the investigation him/herself or interview pupils.

3. The Headteacher/Principal will exercise and be accountable for their professional judgement on the action to be taken as follows:

- If the actions of the member of staff, and the consequences of the actions, raise credible Child Protection concerns the Head Teacher/Principal will notify the Dudley Designated Officer. The LADO will liaise with the Chair of Governors and advise about action to be taken and may initiate internal referrals within Dudley Childrens Social Care to address the needs of children likely to have been affected.
- If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the pupil. These should be addressed through the school's own internal procedures.
- If the Headteacher/Principal decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child safeguarding file.

4. Where we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers). In no circumstances will our school/college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Our Governing body/proprietor will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

5. Where an allegation has been made against the Headteacher/Principal or Proprietor, then the Chair of the Governing Body takes on the role of liaising with the LADO in determining the appropriate way forward.
Managing Allegations of Abuse against a person who works with children

6. Where the allegation is against the sole proprietor, the referral should be made to the LADO directly.

Appendix 4

Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as:
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which
- Encourage, justify, or glorify terrorist violence in furtherance of beliefs
- Seek to provoke others to terrorist acts
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts or
- Foster hatred which might lead to inter-community violence in the UK.

4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Pupils may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff can recognise those vulnerabilities.

6. Indicators of vulnerability include:

- Identity Crisis – the student/pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the student/pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student/pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the student/pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.

- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- Special Educational Need – students/pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. This list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

- Being in contact with extremist recruiters.
- Family members convicted of a terrorism act or subject to a Channel intervention.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and/or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis

Appendix 5

Role of the Dudley LADO
LADO is Yvonne Nelson-Brown & Valerie Wilmott.

The role of
Dudley's Designated Officer (LADO)

Managing Allegations
Against Employees/Volunteers in Dudley

What is an allegation in respect of someone in a Position of Trust? If it is deemed a person has-:

- **Behaved in a way that has harmed, or may have harmed, a child**
- **Possibly committed a criminal offence against or related to a child**
- **Behaved towards a child or children in a way which indicates he or she would pose a risk of harm if they work regularly or closely with children**
- **Behaved or may have behaved in a way that indicates they may not be suitable to work with children**

These behaviours should be considered within the context of the definitions of 'abuse and neglect' and should include concerns relating to inappropriate relationships between members of staff/adults and young people -

- Having a relationship with a child under 18 even if this is consensual
- Grooming – meeting with child under 16 with intent to commit a relevant offence
- Other behaviour indicating concern –i.e. Contacting child via social media, sharing of images, inappropriate text/email messages possession of indecent photos or fake photos of children

The role of
Dudley's Designated Officer (LADO)

What Dudley's Designated Officer (LADO) does?

The Designated Officer (LADO) is Social Work Qualified who on the behalf of Dudley Safeguarding People Partnership (DSPP) oversees all allegations against any person who is working with children and vulnerable young people.

Included in this group are agency staff, foster carers as well as people who are in a position of authority and have regularly contact with children such as religious leaders, political figures or school governors (this is not an exhaustive list) and whether in a paid or unpaid capacity

The appointment of the Designated Officer (LADO) is in response to 'Working Together to Safeguard Children' March 2018, Chapter 2 pg 56; and Children Act 2004 Section 10 and S11.

The DSPP and its partner agencies are under a duty to inform and assist the Designated Officer (LADO) in managing this process from referral to conclusion.

Designated Officer (LADO) has the authority to (or inform employers to) refer individuals in a Position of Trust to Governing Bodies or to relevant authorities for consideration of barring an individual from working with children e.g. HCPC, SWE, Ofsted, TRA and so forth.

What are the LADO's responsibilities?

- To coordinate the safeguarding and investigative process in response to allegations made against people working with children
- Provide advice and guidance to employers or voluntary organisations.
- Monitoring the progress of cases to ensure they are dealt with within agreed timescales.
- To scrutinise and challenge employers where procedures are not followed.
- Ensuring a consistent and fair process for all those working with children and young people where allegations have been made.
- Maintains information on a secure database in respect of all allegations.
- Produce an Annual LADO report for Dudley Safeguarding People Partnership.
- Chairing of Position of Trust meetings,
- Contribute to training and development programmes and raising awareness of the Management of Allegations process across Dudley's workforce.
- Liaise with Strategic Leads for Safeguarding e.g. Ofsted, Police, Education, Health and other partner agencies in respect of governance and leadership.
- Supporting employers in and/or referring identified individuals to the DBS (Disclosure & Barring Service) when they are deemed to pose a risk of harm.

  THE DESIGNATED OFFICER (LADO) DOES NOT CONDUCT THE INVESTIGATION

Position of Trust Principles

- Child's welfare paramount.
- Covers whole of Children's Work Force including volunteers.
- Adults about whom there are concerns should be treated fairly and honestly and provided with support by their employer.
- Responsibility of all adults to promote welfare of children and young people. This responsibility extends to a duty of care for those adults employed, commissioned or contracted to work with children and young people.
- It is important to note that situations in a personal environment are considered in the wider context of safeguarding children.

Managing Allegations should be fair, balanced and proportionate

- If a concern is raised that a person may have behaved inappropriately or information is received that may constitute an allegation the following actions should be taken:

- Report it to the designated Senior Manager as soon as possible, however trivial it may seem; this person needs to have management responsibility for the employee/volunteer & service.
- Make a signed and dated written record of the concerns, observations or the information received to pass on to the Designated Safeguarding lead
- The employer should ensure the person who the allegation/concern is raised, is informed of the allegation and given the opportunity to comment apart from where doing so might affect any potential criminal investigation, the matter is already subject to police investigation and/or it is not safe to do so i.e. it may place a child/young person at risk of harm – you must ensure you record your reasons for not doing so)
- Maintain confidentiality, guard against publicity while an allegation is being considered or investigated, and follow local information sharing protocols.

Don't Delay - Safeguarding is Everyone's Responsibility

- Challenge poor practice in the workplace; it may prevent an allegation being made
- If you suspect a child is suffering, or likely to suffer, significant harm, referral to MASH needs to be made; they are contactable on:0300 555 0050
- ask the question 'is a Strategy Meeting needed', if not why not.
- Monitoring and progressing of cases is essential – Outcomes must be fed back to the LADO

Do not

- make assumptions, offer alternative explanations or diminish the seriousness of the behaviour or alleged incidents.
- keep the information and promise confidentiality.
- take any action that might undermine any future investigation or disciplinary procedure, such as interviewing the alleged victim or potential witnesses, or informing the alleged perpetrator who may be a parent or carer.
-

The same action should be taken if the allegation is about abuse is non-recent, as it will be important to find out if the person is still working with or has access to children.

You can ask the LADO for advice or consultation prior to submitting the referral form. Please be reminded not to ask individuals to complete statements if this is subject to police investigation (these are done by the Police) however, internal incident logs/reporting mechanisms need to be completed. Do not start internal investigations and/or dismiss the Person of Concern when in a POT Process.

You can find the POT referral form and Guidance as well as the MARF on the DSPP website. Send completed POT referrals to: allegations@dudley.gov.uk

Staff should also familiarise themselves with the guidance to Safer Working Practices, Oct 2020 for those working with children and young people.

If you are requested to attend a Position of Trust Meeting - please come prepared with any information your agency may hold in respect of the children and family and especially in respect of the Employee/Volunteer concerned.
This information can be forwarded to the LADO in advance of the meeting but your attendance is still important.

LADO service contact details:
For Yvonne Nelson-Brown – 01384 813110
For Valerie Wilmot – 01384 813164
General line: 01384 813061

Safeguarding is Everyone's Responsibility - you have a duty of care and accountability to the DSPP to refer Position of Trust issues

https://safeguarding.dudley.gov.uk/safeguarding/child/work-with-children-young-people/management-of-allegations/

Further advice on Safeguarding matters can also be obtained from:

Safeguarding is about us working together to make sure that children, young people and adults are safe and protected, free from harm, abuse or neglect. Adults should also be free to make their own choices.

We are committed to preventing the abuse of individuals who are vulnerable and we respond promptly when concerns are raised.

If you are worried, concerned, or scared about the way you, or someone you know is being treated, or is treating themselves, don't keep it to yourself, tell us.

For Children:

Call Children's Services on **0300 555 0050** selecting **option 4**
(9:00 – 5:00 Mon – Fri)

For Adults:

Call **0300 555 0055** and select **option 1**
(9:00 – 5:00 Mon – Fri)

Out of Hours:

Call **0300 555 8574** or in an emergency call 999

NSPCC

- Harmful Sexual Behaviour project: **0844 892 0273**
- Keeping children safe online-online safety/sexting/sending nudes

National Contacts

- Police (Non-emergency 101)
- CEOP (Child Exploitation and Online Protection) CEOP Safety Centre
- Professionals Online Safety Helpline – 0844 381 4772 Safer Internet Helpline
- Internet Watch Foundation (IWF) – Internet Watch Foundation
- Safer Internet Centre – helpline@saferinternet.org.uk
- Childline – 0800 1111 Childline
- Ofsted – General enquiries: 0300 123 1231
  About Schools: 0300 123 4234
  Concerns: 0300 123 4666
  e-mail: enquiries@ofsted.gov.uk
- HM Government (advice on protecting children from radicalisation for parents, teachers and leaders) www.educateagainsthate.com
- **NSPCC** Harmful Sexual Behaviour project: **0844 892 0273**

Useful websites

- https://safeguarding.dudley.gov.uk/safeguarding/Child Exploitation and Online
- Protection Centre (CEOP) – Ceop-Police & knowaboutcse
- NSPCC – 24-hour Child Protection Helpline 0808 800 5000
  NSPCC
- WOMENS AID - 24 Hour Helpline: **0870 2700 123**
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a child is in immediate danger, please call 999. Unicef