

SAFEGUARDING AND CHILD PROTECTION POLICY 2022- 2023.

Author/Person Responsible	Louise Leader
Date of Ratification	TBC
Review Group	Full Management Committee
Ratification Group	Full Management Committee
Review Frequency	Annual
Review Date	September 2023
Previous Review Amendments/Notes	This document replaces: PLC Safeguarding and Child Protection Policy and Procedures. September 2022-2023
Related Policies	<p>Allegations against staff; Attendance; Anti-bullying; Relationships (previously called Behaviour); Code of Conduct; Complaints; Educational Visits; Equality (including anti-bullying); Exams; Health and Safety; Medical Needs (including intimate care); Online Safety (along with separate parent/carer acceptable use and staff acceptable use policies); Physical Intervention ; Recruitment; Sexting Policy; SEN policy Staff discipline and Grievance and Whistle-Blowing.</p>
Chair of Management Committee's Signature	

Equality Impact Assessment (EIA) Part 1: EIA Screening

Policies, Procedures or Practices:	Safeguarding and Child Protection Policy	DATE:	
EIA CARRIED OUT BY:		EIA APPROVED BY:	

Groups that may be affected:

Are there concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for a positive impact
Age (young people, the elderly; issues surrounding protection and welfare, recruitment, training, pay, promotion)	No	Yes
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication)	No	Yes
Gender reassignment	No	Yes
Marriage and civil partnership	No	Yes
Pregnancy and maternity	No	Yes
Race	No	Yes
Religion and belief (practices of worship, religious or cultural observance, including non-belief)	No	Yes
Gender identity	No	Yes
Sexual orientation	No	Yes

Any adverse impacts are explored in a Full Impact Assessment.

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SECTION 1

INTRODUCTION including Roles and Responsibilities

1.1 At Pathways Learning Centre we are committed to creating and maintaining a safe and secure environment for pupils, students, staff (**including supply staff**), governors, volunteers and visitors and to promoting a climate where children, young people and adults will feel confident about sharing any concerns that they may have about their own safety or the well-being of others. We believe that our school provides a safe, positive and caring environment in which children and young people can grow in their social, physical and moral development. We recognise the vital contribution our school can make in safeguarding children and young people from harm and we intend to carry out our responsibilities actively and enthusiastically in liaison with all other concerned parties.

1.2 - Our policy draws on all relevant legislation and guidance including:

- The Children Act (1989 and 2004);
- Keeping Children Safe in Education: Statutory guidance for schools and colleges (2022);
- The Prevent Duty (2016) and Revised Prevent Duty Guidance (2021);
- The four guiding principles of the UN Convention on the Rights of the Child (UNCRC); and
- Working Together to Safeguard Children (2018)
- South Gloucestershire Children's Partnership (2022- 2023)

Other school policies and procedures which should be read alongside this policy are listed on page 1.

In particular, we will ensure that we follow the relevant legislation and ensure that our policy and procedures meets the requirements for KCSIE (2022) at all times.

1.3 – Safeguarding children and staff

We recognise that this policy has been established with the intention of protection the safety and welfare of children AND staff at Pathways Learning Centre.

1.4 – Consideration of children and young people (CYP) with SEND

The majority of pupils at PLC have special educational needs and disabilities (SEND) and this places them potentially at an increased risk of abuse. There are six reasons why CYP with SEND and / or disability are more vulnerable to abuse than their non-disabled peers: difficulties with communication; isolation; disproportionately affected by bullying; dependency on others; inadequate response to disclosure; missing the signs – not considering changes as possible abuse but assuming it is their SEND ; and lack of education on staying safe. We recognise the need for all to be alert to the risks posed by those who may wish to harm children and young people in school or travelling to and from school and their homes, and to maintain an attitude that “it could happen here” where safeguarding is concerned (Keeping Children Safe in Education, 2022)

It is essential that staff consider the contextual presentation of a CYP when considering potential safeguarding concerns and ensure that any concerns are highlighted early, so appropriate additional pastoral support can be put in place.

1.5 - Contextual safeguarding

At PLC, we recognise how important it is that consideration of children's safeguarding needs takes into account all of their social sphere, not only that at school. This is referred to as 'Contextual Safeguarding'. We ensure we consider all aspects of the CYP in all assessments of a pupil's needs; it is inherent in how we operate.

1.6- Extra Familial harm

Extra-familial harm takes a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines (KSCIE 2022).

1.7- Mental Health

We recognise the role of safeguarding to protect the mental health needs (as well as physical health needs) of CYP. This is particularly true within the context of PLC and the needs of the children and young people who attend. We invest heavily in the training and support of staff to understand the impact of adverse experiences which can affect CYP mental health and in the intervention and support structures in place to carry out early help and preventative work.

1.8 – Information for parents

A copy of this policy is available to parents/carers on request and is also available via the school website at <https://www.pathwayslearningcentre.org.uk/policies/>

1.9- Scope of the policy

Our policy applies to all staff, **including supply staff**, volunteers, and members of the Management Committee working in school. Concerned parents/ carers may also contact the Designated Safeguarding Lead (DSL) or Deputy DSLs in their absence.

1.10- Policy structure

The aims of this policy are set out in 2.0 below. The policy has been structured in to five key sections:

1. Clarifying **roles and responsibilities** of all members of the community, to ensure safeguarding is always a priority in everything we do. This is underpinned by the constant development of a positive schools ethos, a safe environment, opportunities for pupils to develop resilience, empathy and understanding, in relation to their own safety and the safety of others. All of which is strengthened by the development of positive relationships.
2. **Systems for reporting** child protection concerns and **supporting** guidance.
3. Information related to **specific safeguarding issues**.
4. Additional information for staff.
5. Other safeguarding procedures including **wider school management and support systems**, which are in place to protect children and young people.

2.0 - AIMS OF THE POLICY

- 2.1 To support the development of the whole child as an individual by promoting security, confidence and resilience
- 2.2 To raise awareness of all staff and governors as to their individual and joint responsibilities in identifying, reporting and supporting children as set out in Keeping Children Safe in Education 2022.
- 2.3 To ensure that staff concerned with particular children and young people in need are aware of their role and responsibility in safeguarding these pupils as set out in Keeping Children Safe In education 2022.
- 2.4 To ensure awareness of the range of high risk groups such as those listed in **Annex B of KCSIE 2022** (Annex B, pages 140- 161)
- 2.5 To ensure all staff are aware of the principle of '**contextual safeguarding**', and "**extra familial harm**" particularly within our setting as referred to in 1.5 and 1.6.
- 2.6 To raise awareness of all staff and governors of their individual and joint responsibilities to report lower level concerns staff may have about colleagues and where these concerns do not meet the harms test (KCSIE 2022, Part 4, Section 2).
- 2.7 To raise awareness of all staff and governors of their individual and joint responsibilities to report concerns they may have about colleagues which meet the harm threshold (KCSIE 2022, Part 4, Section 1).
- 2.8 To use a clear system of monitoring children and young people who are known to be or considered to be at risk of harm.
- 2.9 To ensure that there is good, appropriate and effective communication between all members of staff.
- 2.10 To develop and promote effective working relationships with other agencies, especially Social Care, Health professionals and Avon and Somerset Police
- 2.11 To ensure all adults working within the school with access to children and young people undergo all relevant checks e.g. enhanced DBS, barred list checks and prohibited checks, as set out in Keeping Children Safe in Education (2022) Part 3.
- 2.12 To ensure all staff are clear about the '**Paramountcy Principle**'; that the welfare of the child is the paramount consideration.

3.0 THE SAFEGUARDING TEAM

Designated Safeguarding Lead (DSL)

The person/s with lead responsibility for safeguarding is:

Louise Leader (Head Teacher) and Laura Spires (Head of Student Support and Interventions)

Deputy DSL(s) are:

Rhian Kempson, Jo Noott, Sharon Galton

Other members of the Safeguarding team are:

Dan Walton, Gareth Jones, Connie Coppin

Heather Beach, Cassie Perryman

Designated Governor - The responsibilities of the Management Committee are outlined in Part two of Keeping Children Safe in Education 2022. The Designated member of the Management Committee for Safeguarding at this school is:

Hillary Smith

The role of the DSL is very clearly set out in Appendix C of the Keeping Children Safe in Education, September 2022. In some cases, these responsibilities are shared with the DDSL's, however, at all times the DSL maintains overall responsibility.

The person with lead responsibility for Safeguarding (DSL) is responsible for ensuring that proper procedures and policies are in place and are followed with regard to safeguarding and child protection issues. Operational safeguarding matters are delegated to the DDSL team. They will act as a dedicated resource available for other staff, volunteers and governors to draw upon. The DSL/DDSL's are expected to be aware of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

4.0 The DSL is responsible for:

- 4.1 All matters related to the safeguarding of CYP in PLC are in place;
- 4.2 Ensure DSL / DDSL and all other staff employed by PLC are suitably trained to be able to fulfil their roles and responsibilities;
- 4.3 Adhering to South Gloucestershire Children's Partnership (SGCP) procedures by referring children and young people to the Access and Response Teams (ART) on 01454 866000, if there are concerns about their safety or well-being;
- 4.4 Ensuring that in the case of a referral to ART, the parents/carers are informed prior to the referral being made, unless doing so would put the child or young person at risk of further harm;
- 4.5 Ensuring any concerns regarding radicalisation are referred to the 'Channel Programme' (see page 150 of KCSIE 2022);
- 4.6 Ensuring that written records are kept about any child or young person about whom there are concerns of possible abuse or neglect (see definitions 11.4);
- 4.7 Ensuring the safe storage of confidential paper records in a secured cabinet;
- 4.8 Checking the attendance of children and young people subject to a child protection plan and notifying the local social care team, or named social worker, if:
 - a pupil subject to a child protection plan is excluded either for a fixed term or permanently
 - there is an unexplained absence of a pupil subject to a child protection plan of more than a day from school (or one day following a weekend) without contact and good reason;
- 4.9 Ensuring attendance at Initial Case Conferences, Core Groups and Child Protection Review Conferences;
- 4.10 Ensuring the completion of written reports to social care on request within the agreed time limits;
- 4.11 Ensuring effective liaising with other agencies to safeguard children and young people;
- 4.12 Ensuring parents/carers are notified as soon as possible if a child or young person sustains an injury or are affected by an incident whilst they are the responsibility of the school;
- 4.13 Ensuring that a photocopy of all child protection records is forwarded, under confidential cover, to a child or young person's new school following a transfer;
- 4.14 Ensuring the retention of copies of all child protection files, including those for children or young people no longer on roll, until the child reaches 25.

5.0 The Management Committee ensures that:

- 5.1 There is a Designated Safeguarding Lead (DSL), who is a member of SLT, and who is trained to an advanced level. Training will be updated at least every 2 years thereafter;
- 5.2 There are enough DDSLs trained to the same advanced level as the DSL to carry out the duties required to support our CYP in all safeguarding related issues;
- 5.3 Every member of staff and every member of the Management Committee knows and understands:
- the name of the DSL, Deputy DSLs and the Designated Member of the Management Committee and their roles around safeguarding and child protection
 - that they have an individual statutory responsibility for referring child protection concerns to the DSL and deputy DSL's as soon as can reasonably be considered possible
 - that teachers have an **individual statutory responsibility** for reporting suspected cases of Female Genital Mutilation (FGM). Non-teaching staff should report their concerns to a teacher. See 10.7 for further details.
 - their responsibilities as outlined in Keeping Children Safe in Education 2021, Part 1 for teaching staff and Part 2 for the Management Committee.
- 5.4 Every member of staff signs a disclosure that they have read and understood KCSIE Part 1 and Annex B and the Management Committee signs a disclosure confirming they have read and understood KCSIE Part 2.
- 5.5 All members of staff receive full repeat training every 3 years which covers:
- their personal responsibilities in relation to child protection
 - school child protection procedures
 - Contextual safeguarding and extra familial harm
 - identifying signs of abuse/suspected abuse
 - how to support a child, young person or adult who discloses abuse
 - awareness of the local early help process and their role within it
 - understanding the additional risk for CYP with SEND
 - current national and local issues in safeguarding and child protection
 - whistleblowing and the role of the Local Authority Designated Officer (LADO)
 - relevant legislation related to child protection
 - Issues related to 5.6 – 5.8 below
- 5.6 All matters relating to child protection are confidential. Information about a child or young person will only be disclosed to members of staff on a need to know basis, in line with [Information Sharing Guidance for Practitioners Providing Safeguarding Services July 2018](#);
- 5.7 All staff are aware of their professional **responsibility to share information** with other agencies in order to safeguard children and young people;
- 5.8 All staff are aware that they should **never promise a child or young person confidentiality**;
- 5.9 All members of staff recognise that statistically **CYP with SEND are most vulnerable to abuse**;

- 5.10 All members of staff receive regular training updates and refreshers as necessary;
- 5.11 All new staff will receive safeguarding training as part of their induction programme and are given a copy of our child protection procedures;
- 5.12 On arrival, all supply and temporary staff are given a copy of the school procedures and flowchart and the names of the DSL, Deputy DSL(s) and Chair of the Management Committee;
- 5.13 Entry to school premises is electronically controlled by doors and CCTV and that authorised visitors to the school will be logged into and out of the premises;
- 5.14 Visitors, when arriving at reception, will be asked to read a summary of the school's safeguarding procedures. Their signing in will be an acknowledgement that they understand the purpose of the procedures;
- 5.15 Parents and carers are allowed on school site during agreed times of the day (eg. during pick-up and drop-off) and with the permission of the school. Should there be any concerns raised about the conduct of parents/carers or visitors they will be asked to leave and further action taken to ensure the safety of children and young people;
- 5.16 Parents/carers are aware of the responsibilities of staff with regard to child protection and understand the role staff play in child protection and that good communication between parents/carers and the school is vital to this;
- 5.17 The responsibilities of the Management Committee is also outlined in part two of 'Keeping Children Safe in Education (KCSIE) 2022'.

6.0 – Staff will ensure they:

- Establish and maintain an ethos of positive relationships, where children and young people feel secure, are encouraged to talk, are listened to and believed
- Ensure children and young people know that there are adults in the school who they can approach if they are worried or in difficulty
- Understand their individual roles and responsibilities related to safeguarding, as outlined in this policy
- Abide by the staff code of conduct at all times (see 9.12)
- Follow the guidance in this policy and clarify any uncertainty with a member of the DSL team

7.0 CONTACT INFORMATION

Designated Safeguarding Lead/s for Pathways Learning Centre:

Louise Leader.

01454 862630

Louise.leader@pathwayslearningcentre.org

Laura Spires

01454 862630

Laura.Spires@pathwayslearningcentre.org

Access and Response Team (ART)

01454 866000

accessandresponse@southglos.gov.uk

Emergency Duty Team (EDT) – out of hours and at weekends

01454 615165

COMPASS (formally known as Single Assessment Framework early help (SAFeh))

01454 864682/5734

compass@southglos.gov.uk

Tina Wilson

Local Authority Designated Officer (LADO)

01454 868508

Tina.Wilson@southglos.gov.uk

Police Child Abuse Team

01179 286008

South Glos Channel Practitioner (Prevent Duty): Robert Walsh

01454 865818

preventproject@southglos.gov.uk

Police Channel Practitioner (Prevent Duty):

01278 647466

channelsw@avonandsomerset.police.uk

Rhian Kempson Deputy DSL

01454 862630

Jo Noott Deputy DSL

01454 862630

Sharon Galton Deputy DSL

01454 862630

Our School Health Advisor is available on:

01454 862441/2442

01454 338804

Chair of the Management Committee.

This email address is available in the staff room on the Safeguarding notice board.

Reviewed and updated: 09.09.22

by Louise Leader and Laura Spires

Next review due: 31.8.23

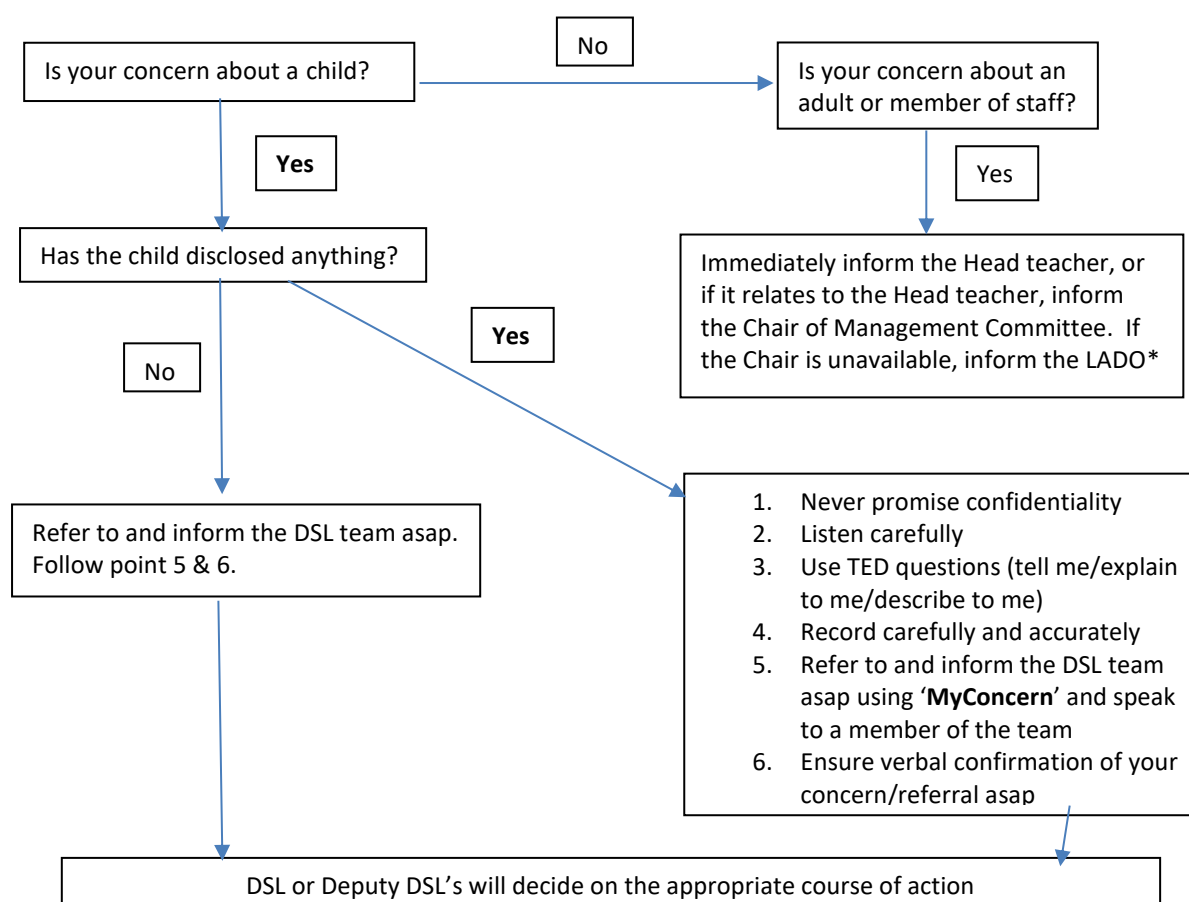
SECTION 2

8.0 REPORTING CONCERNS

Reporting concerns is done via the MyConcern internet based programme. All staff have individual logins.

The procedure below is a summary flow chart of all action relating to the schools child protection and safeguarding and should be followed in each and every case:

8.1



It is important that all communication is entered into 'MyConcern' as soon as possible as an official and dated record. If you do not have access to 'MyConcern', your concern should be given in writing to the DSL/DDSL, using the safeguarding proforma found on the staffroom safeguarding notice board. You must sign and date your written notes.

*Chair and LADO contact details can be found on Page 12, above.

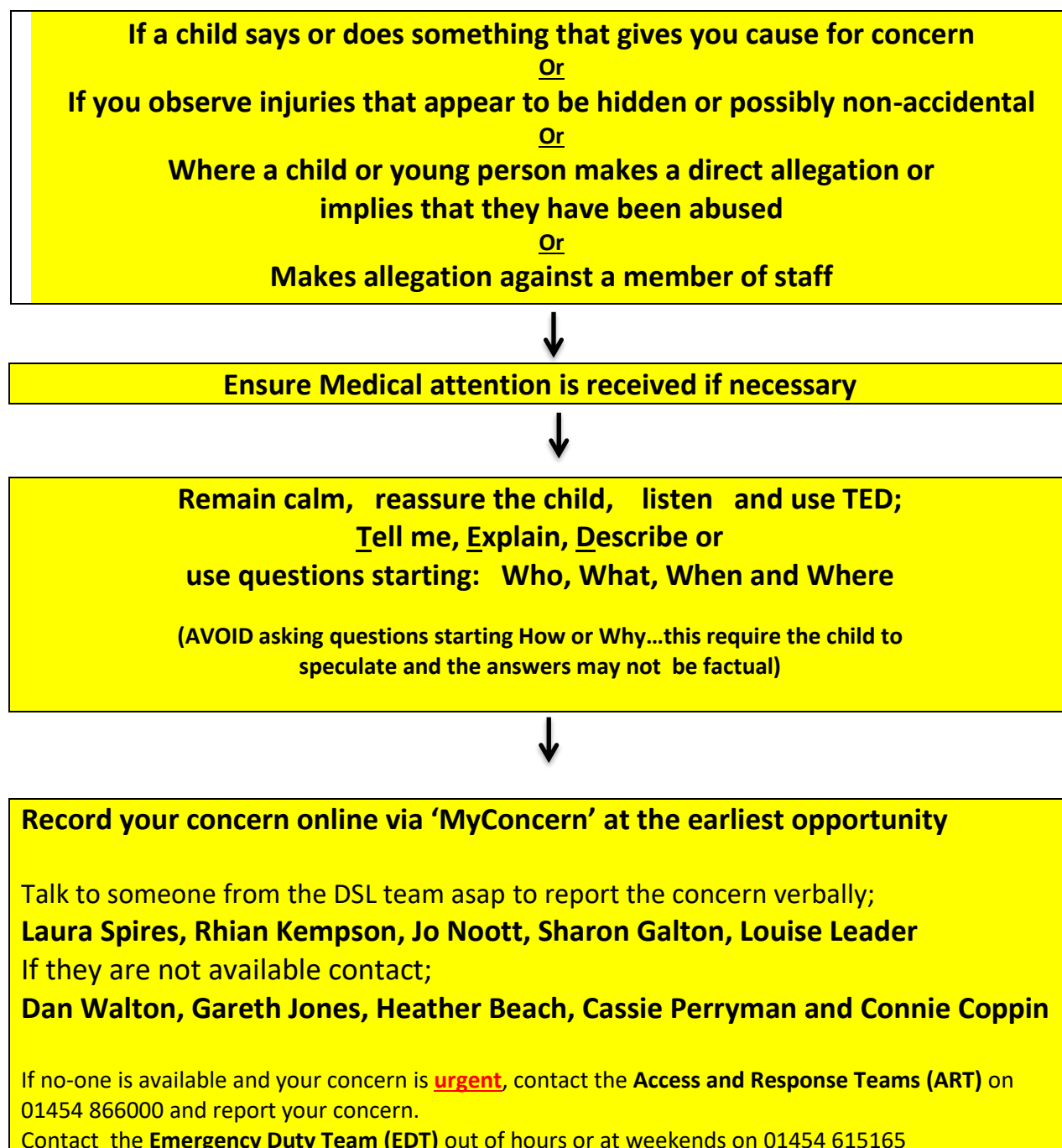
DSL Team - See also NPCC – When to call the police guidance

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20police%20guidance%20for%20schools%20and%20colleges.pdf>

8.2 - Safeguarding flowchart

Responsibility for Safeguarding and Child Protection:

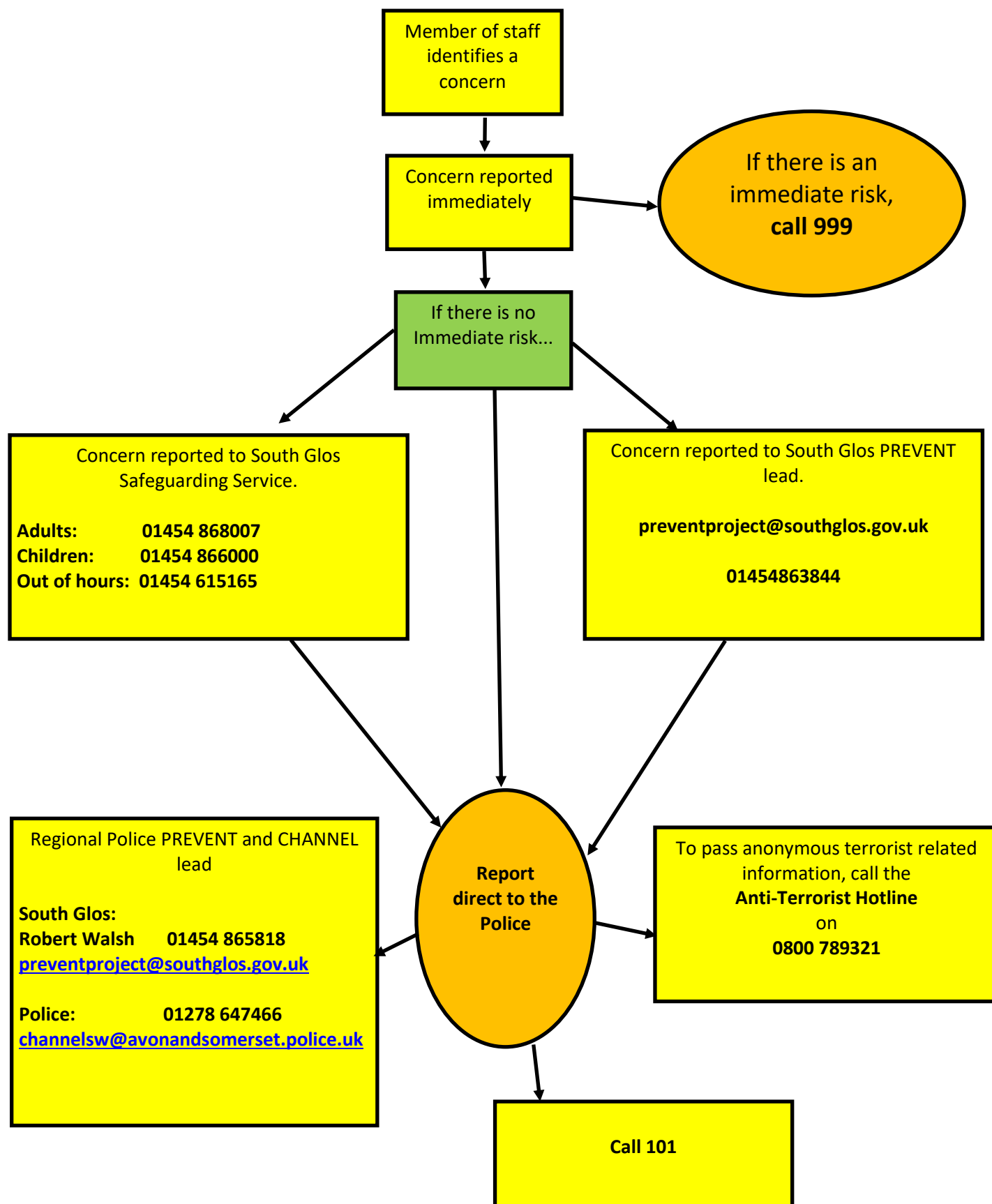
Louise Leader and Laura Spires	Designated Safeguarding Lead/s (DSL)	01454 862630
Rhian Kempson, Jo Noott, Sharon Galton	Deputy DSLs	01454 862630



You are required by PLC not to investigate suspicions; that is the role of the Police. Your role is to record your concerns and suspicions and pass them on. PLC will ensure that all members of staff and employees are familiar with the procedures for using MyConcern and with the requirements of South Gloucestershire's Children's Partnership.

Where any member of staff fails to report their concerns, this may be dealt with as a disciplinary matter.

8.3 -PREVENT Referral Process for vulnerable individuals (see further guidance 10.14)



8.4 - Notification of Safeguarding/ Child Protection Concern

This paper document is now only used for emergencies, if the digital system is not operational. The same process of reporting the concern to a member of the DSL team must be followed.

Name of reporting staff member:

Name of Student:

Students Date of Birth:

Date/ Time/ Location of concern (if there is a delay in recording, please explain):

Details of concern (include full names of people involved/ location(s)/ exact words used (if applicable):

What action has been taken?

Is the concern Urgent? (please indicate why you consider the concern to be urgent)

If there are any accompanying attachments, these should be with this concern when handed to a member of the safeguarding team.

This concern must be handed to a member of the safeguarding team.

9.0 - REPORTING AND SUPPORTING GUIDANCE

9.1 – Procedures

The procedures for safeguarding children and young people are in line with the South West Child protection Procedures which can be accessed at: <https://www.proceduresonline.com/swcpp/> or by clicking this link: [South West Child Protection Procedures](#). They are also in line with those procedures on the South Gloucestershire Children's Partnership (SGCP) website, which can be accessed at – <http://sites.southglos.gov.uk/safeguarding/category/children/safeguarding-children-board/> or by clicking this link: [SGCB link](#).

9.2 - Early Help

Keeping Children Safe in Education (2022) states that, "staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner". We follow the South Gloucestershire early help process as set out by the Common Business and Delivery Process. This process asks professionals to use the Early Help Assessment and Plan (EHAP) process to identify the needs of a young person and their families. In some cases, it may be appropriate for a member of school staff to initiate an EHAP and take on the role of Lead Professional, or become a member of a Team around the Child/Family (TAC/F) as part of the EHAP process. If this is the case, then the staff member should be supported by the DSL, for example, by being given time to write the EHAP and attend TAC/F meetings. All staff should have an understanding of the EHAP process and how they can contribute to it, as and when appropriate.

The Head of Student Support and Interventions is the EHAP's co-ordinator at Pathways Learning Centre. They have oversight of all EHAPs but may not be the Lead Professional on them.

9.3 – Safeguarding the child or young person (CYP)

If a child is in immediate danger or is at risk of imminent harm, a referral should be made by the DSL or DDSL's to the Access and Response Team and/or the police immediately. Referrals to the Access and Response Team should be made verbally by phoning 01454 866000 and then following up with an ART referral form. A digital copy of this form can be found at: [J:\Child Protection and Safeguarding\Access and Response Team](#).

9.3.1 The Police can be contacted by phone by dialling 101 or 999 in an emergency.

9.3.2 All details should be recorded by the reporting staff member in MyConcern and the referral document/notes should be added to the MyConcern file for the event.

9.3.3 If a member of staff has concerns that a child is, or may be at risk of harm, but is not in immediate danger, they should share their concerns with a member of the DDSL team. This should be done using MyConcern **and** a conversation in person with a member of the DDSL team.

9.3.4 The receiving member of the safeguarding team will make a decision about the actions required and will communicate this to the appropriate people. It is likely that the staff who have reported concerns may be asked to complete various additional tasks.

9.3.5 It is the DSL or DDSL's role to decide whether the case should then be referred to an outside agency. They may make the referral themselves or ask another member of staff to do so, offering support as necessary.

9.3.6 All communications and actions that are recorded in MyConcern automatically become part of the chronology.

9.3.7 In an emergency anyone can make a referral to an outside agency; although it is helpful, in terms of managing the flow of information, if referrals are made by members of the Safeguarding Team.

9.3.8 We remember to care for our colleagues when they are involved in any disclosure. We recognise that we do not need to have access to all the details to care for a colleague who may be under stress.

9.3.9 **Please respect the child's right to confidentiality** so that only the people who need to know are party to details of any abuse to that child.

9.4 - Responding to a child or young person (CYP)

9.4.1 We should remember that research shows that children rarely make up stories – particularly about sexual abuse - and may make several attempts to tell what is happening before they are actually heard. It is therefore essential that we take any such attempt to tell very seriously.

9.4.2 If you have reason to suspect that a child has been abused, or if a child discloses abuse to you, you should **listen** and ask only the **minimum** of **necessary** questions. It is the role of all of us to clarify issues but **it is the role of the Police and Social Care to investigate**.

9.4.3 We must take care **not to ask leading questions**, which are not relevant to our role and responsibility for the child. Such questions could prejudice any action the police or others might wish to take about any offence which may have been committed.

9.5 – Response script / guide (Also see 8.2)

- **LISTEN** carefully, (but avoid leading questions)
 - Use minimal 'TED' (Tell, Explain and Describe) questions, to gain clarification if necessary
 - Use minimal questions starting 'who, what, when or where'. These provide factual information.
 - **DO NOT** use questions starting 'how or why' as these require the student to speculate and the answers may not be factual.
- **REASSURE** them that they were right to tell you and that you take them seriously.
- **TELL THEM:**
 - You will need to talk with and get advice from someone else
 - **Do not promise confidentiality.** It is rarely in the best interests of the child to do so.
 - Prepare them gently for the involvement of the DSL and or DDSL's and outside agencies
 - That you will try to get help for them and/or their family

- **RECORD:**

- Make a written note of the details ASAP as well as verbally informing someone from the DSL team as soon as possible.
- Report the concern via MyConcern ASAP as well as verbally informing someone from the DSL team. Scan and add any written notes to the event chronology. Use the child's words where possible, as this will help ensure accuracy in recalling events later. Do not delay in recording your concerns, and remember, **MyConcern is available from any web-enabled device, anywhere, any time.**
- **Do not use email to communicate safeguarding issues.** Messages are not secure, may not be read immediately or may not be seen at all. This will delay getting help for the child. An early referral gives others more time to make arrangements to ensure the safety of the child.
- Use a body map if appropriate, to record the location and size of injuries. One is available in MyConcern on the initial reporting page, after you have entered the student's name.

9.6 Disclosures during a school Trip or visit- The DSL/DDSL is unlikely to be with you. Follow this guidance:

- **SHARE** your concerns with the Trip Leader or Senior Member of staff, whilst respecting as far as possible, the child's right to confidentiality
- **TELEPHONE** the school and inform the DSL or DDSL of the situation as soon as you are able.
- Follow the guidance in 9.4 and 9.5.
- **When you return** to PLC, **complete** a report in MyConcern if one has not already been started, or **add** any relevant information to one that has.

The DSL/DDSL will take advice and either:

- Contact the police
- Make appropriate arrangements to receive the child upon their return to school or, if the situation is sufficiently serious:
- Travel to the venue to collect the child, possibly accompanied by a Social Worker.

9.7 Residential stays

These present unfamiliar environments to many children, and can often heighten emotions. It is not unknown for an abused child, who has found temporary haven on a residential stay, to exhibit alarm and distress as the time to return home to the abuser draws near. It is in the last few days of a residential stay that disclosures are most likely to be made. If you do find yourself in this situation remain calm and follow the procedures above.

Leaders of all school trips should remind themselves of these procedures as part of their pre-trip planning. If you will be away overnight or for longer, you should take the home telephone number of the DSL and DDSL's as emergency contacts.

9.8 Contextual Safeguarding

We recognise that when children and young people are the victims of any adverse childhood experience (ACEs), their self-esteem and sense of self-worth will be adversely affected as well as their ability to self-regulate their emotions. They may also have an external locus of control which may make their response to situations unpredictable. All staff are encouraged to consider the underlying causes for a child or young person's behaviour, and to consider behaviour as one form of communication of their many complex needs.

Pathways Learning Centre may be the only stable, secure and predictable element in the lives of children and young people at risk. We understand that our role is to help children and young people combat the feelings of helplessness and self-blame they may experience in these situations. We do this by maintaining a positive school ethos where children and young people feel valued, safe and secure and are encouraged to talk and are always listened to.

Extra familial harm asks staff to consider the impact of the experiences children and a young person experiences beyond their home environment.

9.9 Supporting staff

Pathways Learning Centre recognises that staff who have been involved with a child or young person who has been abused or appear at risk of harm, may find the situation very stressful and upsetting. Support will be given to staff by providing an opportunity to talk about their anxieties and reflect on possible outcomes with a designated member of staff and to seek further external support as appropriate. Supervision is also available for all members of the Safeguarding Team.

9.10 Allegations against staff (see 11.7 for further details)

- Staff should feel able to report all concerns they may have about adults and that these are shared responsibly with the right person, such concerns should be discussed with the DSL and recorded and dealt with appropriately. "Low-level" concerns do not mean that they are insignificant, it means that the behaviour does not meet the threshold of harm.
- If an allegation is made against, or there are concerns about the behaviour of a member of staff, volunteer or member of the management Committee, the Head teacher must be informed immediately
- Where the allegation is against, or the concern is about the Head Teacher, the Chair of the Management Committee must be informed immediately
- If the Chair of the Management Committee cannot be contacted, the LADO must be informed immediately on 01454 868508
- If the response (from either the Head teacher or the Chair of the Management Committee) to a report of an allegation or concern is felt to be unsatisfactory, then the LADO must be informed immediately.

9.11 Whistleblowing (see 11.7 for further details)

Pathways Learning Centre recognises that children and young people cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. A Whistleblowing Policy is in place for this purpose.

9.12 – Staff code of conduct [Click here to see Staff Code of Conduct.](#)

All staff (paid and voluntary) and members of the Management Committee are expected to adhere to the school's Code of Conduct in respect of their contact with pupils and their families. Children and young people will be treated with respect and dignity and no punishment, restraint, sanctions or rewards are allowed outside those detailed in PLC's policies.

Whilst it would be unrealistic to prohibit all physical contact between adults, children and young people, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism and misrepresentation. If it becomes necessary to restrain a pupil physically, for their own safety or the safety of others, this should be in line with the Pathways Learning Centres Positive Handling Policy. A record will be made of the incident and the Head teacher informed on the same day.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. All rooms which are used for the teaching or for the support interventions of pupils, should have un-obstructed clear glass panels in the doors or the doors left open.

School staff should also be alert to the possible risks, which might arise from contact with pupils and parents/carers outside the school including the use of social media. Please refer to the Online Safety Policy in addition to the Code of Conduct.

SECTION 3

10.0 – INFORMATION RELATED TO SPECIFIC SAFEGUARDING ISSUES

(The following are taken from KCSIE 2022 Annex B – Pages 141-161)

10.1 - Child abduction and community safety incidents.

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teacher or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

10.2 - Children and the Court system.

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5 -11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers. Further information is available at: [Get help with child arrangements - Get help with child arrangements \(justice.gov.uk\)](http://www.justice.gov.uk/get-help-with-child-arrangements)

10.3 - Children Missing from Education (CME)

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school or college's unauthorised absence and children missing from education procedures.

At PLC, our Attendance Officers perform a vital safeguarding role in identifying patterns of attendance and absence that sometimes identify children that are at risk. A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation.

When a child is missing from education, particularly on repeat occasions, our Attendance Officers will make a referral to 'Education Services', an independent Educational Welfare Services company, we contract with. In doing so, we perform a crucial role in helping identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

PLC has in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage. Further information about children at risk of missing education can be found in Children Missing Education guidance, available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

and at [J:\2.0. CHILD PROTECTION AND SAFEGUARDING\Children Missing Education \(CME\)](#)

10.4 - Children with family members in Prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Nicco provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. Further information is available at: [NICCO](#)

10.5- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;

- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available at [Child sexual exploitation: definition and guide for practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/child-sexual-exploitation-definition-and-guide-for-practitioners).

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

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; and
- children who regularly miss school or education or do not take part in education.

10.6 - County Lines

County lines County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

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Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

10.7 Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern slavery: how to identify and support victims - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims).

10.8 - Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

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- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at:

[2491596 C&YP schools guides.indd \(npcc.police.uk\)](#)

[National Cyber Security Centre - NCSC.GOV.UK](#)

10.9 - Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing 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.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if

one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC. [How to Protect Children From Domestic Abuse | NSPCC](#)
- Refuge what is domestic violence/effects of domestic violence on children. <https://www.refuge.org.uk/>
- Safelives: young people and domestic abuse. [Home | Safelives](#)
- Domestic abuse: specialist sources of support - [Domestic abuse: specialist sources of support - GOV.UK \(www.gov.uk\)](#). This includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse.
- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children) [Home: Operation Encompass](#)

10.10 - 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.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the

new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised 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 will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

10.11 - So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

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 131 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.

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers¹²⁸ that requires a different approach (see following section).

10.12- FGM

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

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 through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, 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. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (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 the teacher does not discover that an act of 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, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

10.13 - Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into 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 into a marriage. 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). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created Multi-agency practice guidelines: handling cases of forced marriage- [untitled \(ioe.ac.uk\)](http://untitled.ioe.ac.uk) and Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [HM Government - The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage \(publishing.service.gov.uk\)](http://HM Government - The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage (publishing.service.gov.uk))

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

10.14 - 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.

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).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614211/channel-duty-guidance-protecting-people-vulnerable-to-being-drawn-into-terrorism.pdf).

Additional support

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

The Home Office has developed three e-learning modules:

- **Prevent awareness e-learning** offers an introduction to the Prevent duty.
- **Prevent referrals e-learning** supports staff to make Prevent referrals that are robust, informed and with good intention.
- **Channel awareness e-learning** is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

10.15 - Child on child/ child on child abuse

Children can abuse other children (often referred to as child on child abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

10.16 - Sexual violence and sexual harassment between children in schools and colleges

Context

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

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

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

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Staff should be aware of the importance of:

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

What is sexual violence and sexual harassment?

Sexual violence: It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003/135 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: [Rape Crisis England & Wales](#)

Sexual consent

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;

- sexual intercourse without consent is rape.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos. As set out in [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
 - o sharing of unwanted explicit content;
 - o upskirting (is a criminal offence);
 - o sexualised online bullying;
 - o unwanted sexual comments and messages, including, on social media;
 - o sexual exploitation; coercion and threats.

10.17- Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

The response to a report of sexual violence or sexual harassment

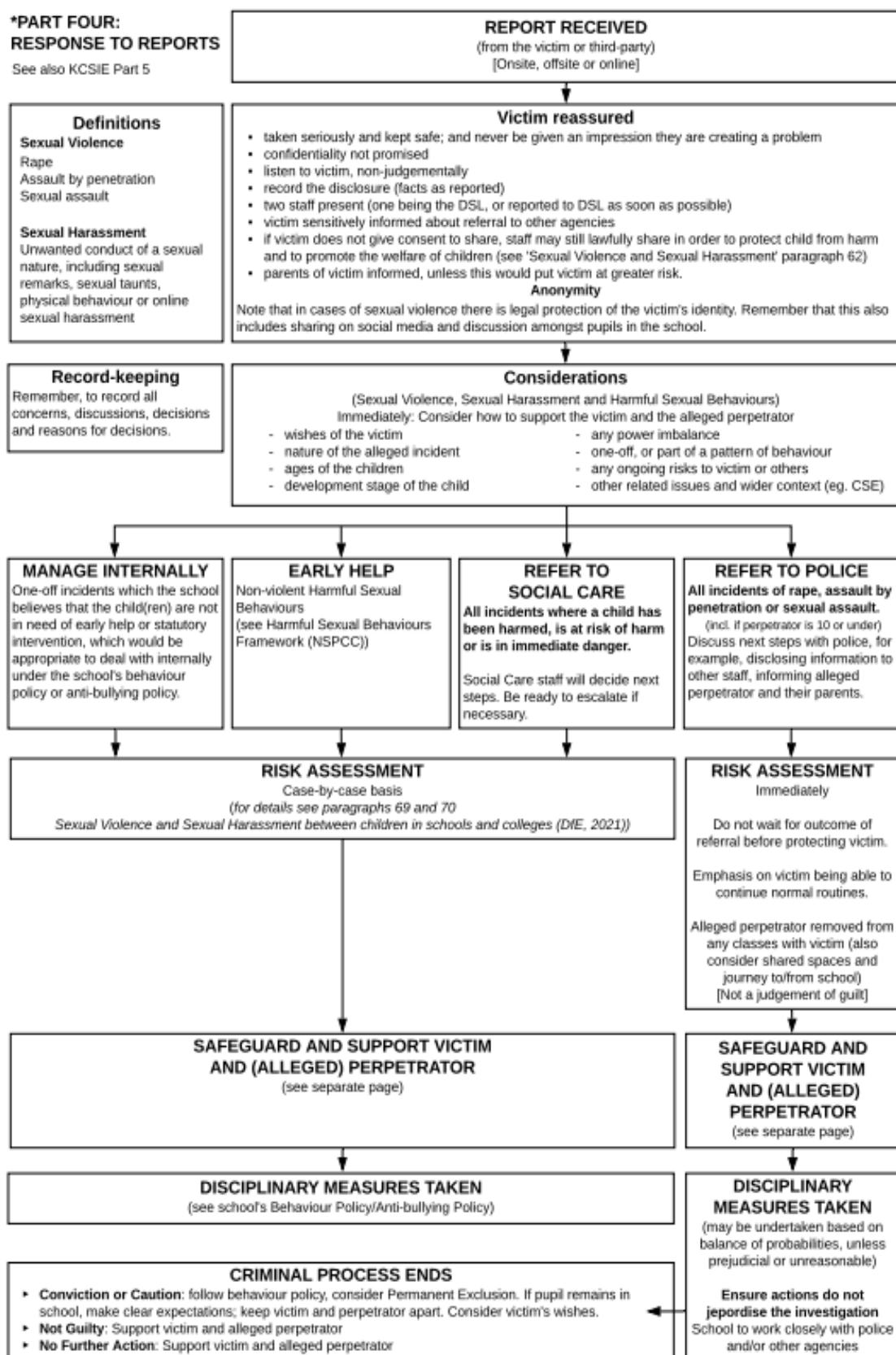
The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or

understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out in 8.2 of this document. 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).

The DSL team in response to a concern raised will refer to, and follow, the latest guidance as set out in this document.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf



Source:

*Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2021)

SVSH Flow Chart for Schools 2021 v.1.0

SECTION 4

11.0 – ADDITIONAL INFORMATION FOR STAFF

11.1 - *Essential reading for all new and temporary staff to Pathways Learning Centre.*

*The Designated Safeguarding Lead is **Louise Leader and Laura Spires***

*The Deputy Designated Safeguarding Leads are **Rhian Kempson, Jo Noott and Sharon Galton***

*The Safeguarding Team also includes **Dan Walton, Gareth Jones, Heather Beach, Cassie Perryman and Connie Coppin***

*The Chair of the Management Committee is **Helen Porter***

Safeguarding is the term which describes the processes and procedures we use to ensure that every child is:

- protected from maltreatment, neglect, violence (including witnessing violence) and exploitation
- protected from impairment of their mental and physical health or development;
- able to enjoy safe and effective care (which avoids adverse childhood experiences)
- supported to secure the best possible outcomes;
- safe from crime, radicalisation and anti-social behaviour in and out of school.

PLC recognises its legal and moral duty to promote the well-being of children, and protect them from harm, and respond to child abuse. We acknowledge our responsibilities to both protect children from maltreatment and prevent impairment.

We believe that every child regardless of age has at all times and in all situations, a right to feel safe and protected from any situation or practice that results in a child being physically or psychologically damaged. This includes any form of bullying, discrimination or exploitation.

As a member of staff working at PLC, you are expected to meet these expectations and are required to report any concerns that arise in your work with PLC students.

The Deputy Designated Safeguarding Leads, listed above, will find an opportunity to talk through these requirements with you during the course of the day. Please seek them out if this does not happen.

Reporting Incidents: If you have concerns about the well-being of a child, for any reason, you should discuss your concerns with a member of the DSL team, or ask another member of permanent staff to direct you to them. If the concern is real, they will then record your concern online via 'MyConcern'.

If you are not sure, ask another member of staff.

Training: If you work for PLC for more than 15 days or 30 half-day sessions in any one academic year, you will be asked for evidence of training on Child Protection and Safeguarding. If you have proof of training within the last two years, you will be asked for a copy of your

certificate. If you do not have a current certificate, you will be offered free on-line training. The Child Protection Officers can advise you about this.

Please sign and date below, to say you have read this document and understand its requirements, then please hand it back to Reception staff:

Name (Print):

Date:

Signature:

Essential reading for all new and temporary staff to Pathways learning Centre.

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.

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

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 involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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 of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- *provide adequate food, clothing and shelter (including exclusion from home or abandonment);*
- *protect a child from physical and emotional harm or danger;*
- *ensure adequate supervision (including the use of inadequate care-givers); or*
- *ensure access to appropriate medical care or treatment.*

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

From: [Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/Working_Together_to_Safeguard_Children_2018.pdf)

**Safeguarding & Child Protection Policy / KCSIE - staff declaration**
Sept 2022 / 2023**Essential reading and safeguarding declaration for all staff**

This document sets out expectations of conduct and practice for staff. Its purpose is to lay down PLC's expectations for everyday judgements and actions of staff. All adults who come into contact with students in their work have a duty of care to safeguard and promote their welfare. Staff are expected to follow the 'Guidance for Safer Working Practice for Adults who Work with Children and Young People' and the information provided in our policies. The key aspects of which have been outlined below. Staff should also be aware of, and have read, 'Keeping Children Safe in Education (KCSIE) Part 1 and Annex B (Sept 2022) and be aware of and have access to a copy of SG PLC's Child Protection and Safeguarding Policy for wider reference.

By signing this form you confirm that you have read and understood the information within these documents.

Breaches of the guidance could result in criminal or disciplinary action being taken.

Definitions:

Staff includes all adults working with children in whatever capacity or setting, paid or unpaid.

Children includes children and young people in education settings under 18 but safeguarding guidance also applies to students who have reached the age of 18 in these settings.

principles:

At PLC we are committed to creating and maintaining a safe and secure environment for pupils, students, staff, governors, volunteers and visitors and to promote a climate where children, young people and adults will feel confident about sharing any concerns that they may have about their own safety or the well-being of others. We believe that our school provides a safe, positive and caring environment in which children and young people can grow in their social, physical and moral development. We recognise the vital contribution our school can make in safeguarding children and young people from harm and we intend to carry out our responsibilities actively and enthusiastically in liaison with all other concerned parties.

PLC recognises its legal and moral duty to promote the well-being of children, and protect them from harm, and respond to child abuse. We acknowledge our responsibilities to both protect children from maltreatment and prevent impairment. We recognise and understand the need for **contextual safeguarding practices** and to be fully aware of the **additional vulnerabilities of the CYP with SEND and mental health needs**. We believe that every child regardless of age has at all times and in all situations, a right to feel safe and protected from any situation or practice that results in a child being physically or psychologically damaged.

Staff should:

- be aware that the welfare of the child is paramount
- understand their individual responsibilities to safeguard and protect children
- **report any concern that they have about the wellbeing and/or medical needs of a child or young person, to a member of the DSL team, immediately. Or in their absence, a member of the SLT or unit lead.**
- Seek support to be released if required, to raise any concern. eg. Medical emergency or risk of immediate harm.
- be responsible for their own actions and behaviour, and avoid any conduct which could lead any reasonable person to question their motives and intentions
- apply the same professional standards regardless of age, disability, race, colour, ethnic or national origin, gender, religion or belief, sexual orientation, marital status or trade union membership.

Safer working practices:

- Staff must treat information about children and their families discretely and not disclose confidential matters.
- Staff should be careful not to misuse their power and influence over children.
- Staff should ensure their behaviour remains professional at all times, including their dress, use of language and online communication which is or could become publicly seen.
- Physical intervention should never be inappropriately used, should follow relevant guidelines and be clearly recorded and reported.
- Physical contact should be minimal, time limited, age appropriate and able to be justified.
- Intimate care and first aid should only be administered according to relevant procedures.
- Staff should be mindful to reduce the risk of allegations against themselves, when working alone with CYP. *eg. Following the 'Lone working policy', or agreeing any lone working with a manager, and ensuring at least minimal visibility behind closed doors. (ie. Window / door blinds not fully closed).*
- Any impromptu or emergency arrangement of lifts should be agreed in advance with a member of SLT and be recorded in Lesson Monitor in SIMS. Staff should not offer lifts to children outside agreed requirements. *i.e if agreed, should be within each students individual timetable.*
- Staff should not receive gifts other than small tokens of appreciation. All gifts should be acknowledged to your line manager.
- Staff should not give gifts other than as part of an agreed reward system or given to all children equally.
- Staff must not give out personal contact details and must not engage in personal email or telephone communication with children. This includes texting, messaging, video chat, social networking sites etc.
- Any out of school contact must be agreed in advance with a member of SLT and with parental consent. An appropriate communications method must be agreed by all parties.
- When a member of staff knows a parent or pupil in an acceptable social context they should notify their line manager.
- Only authorised areas of the curriculum should contain any sexual or other sensitive material. Senior staff should be consulted if there is any chance of misinterpretation.
- Internet use should be according to school policy and inappropriate content must not be accessed.

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- There should be no unauthorised photography of children. Photographs of children should be the property of the school and not retained on personal equipment.
- Staff should guard against young people developing an infatuation with them and report any such concerns to senior staff.
- Staff should be mindful of situations where a student or parent comes to depend on them for support outside their role and discuss this promptly with a senior member of staff.
- Staff are in a position of trust and should never engage in any sexual relationship with pupils in or out of school. Communication must never be sexually suggestive.

Concerns about the conduct of a member of staff:

- Any concern that indicates that a member of staff or volunteer may be a risk to children must be reported to the head teacher immediately. Reports of what has been said or noticed must be put in writing, dated and signed.
- This includes lower level concerns. KCSIE (para. 422-428 2022) states:
 - *'the term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a CYP does not meet the threshold of harm'.*
 - *'A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct'.*
 - *Examples of low level concerns include:*
 - *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*
 - *Using inappropriate sexualised, intimidating or offensive language*
- If you become aware that a colleague has breached the guidance for Safer Working Practice, you must report this immediately to the Head.
- If the concern is about the Head you must report it to the Chair of the Management Committee, or in their absence contact the Local Authority Designated Officer (LADO) as soon as possible on 01454 868508 or the Access and Response Teams (ART) on 01454866000.
- If the LADO is unavailable, **Keep the matter confidential.**
- Do not alert the person you are concerned about as this could compromise any future investigation.
- Follow procedures but you have a duty to ensure matters are taken forward and can contact the Allegation Managers yourself.
- Additional advice and guidance about reporting concerns about a member of staff is available in school and includes managing allegations against staff.

As a member of staff working at PLC, you are expected to meet these expectations and are required to report any concerns that arise in your work with PLC students.

The Designated Safeguarding leads are (DSL) is: Laura Spires / Louise Leader

The deputy DSLs are: Rhian Kempson, Sharon Galton, Jo Noott.

If you are not sure, or in any doubt, ask another member of staff.

Staff Declaration:

I declare that I have read, understood and will adhere to the guidance given above and the information and guidance included in the PLC Child Protection and Safeguarding Policy. I have also read and understood 'Keeping Children Safe in Education (KCSIE) Part 1 and Annex B (Sept 2022):

Name (Print): _____ Date: _____ 2022

Signature:

11.3 - Information Sharing and The Seven Golden rules

From time to time it will be necessary to share information with other agencies and professionals.

Information should only be shared in line with South Gloucestershire policies and HM Government guidance. The information sharing should follow the seven 'golden rules to information sharing' as outlined in the document 'Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers. March 2015'

This document is available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

and on the staff shared drive at:

[J: \Teacher Shared\Child Protection and Safeguarding\DFE Guidance documents](J:\Teacher Shared\Child Protection and Safeguarding\DFE Guidance documents)

1. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

11.4 ABUSE DEFINITIONS

11.4.1 PHYSICAL ABUSE

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

11.4.2 EMOTIONAL ABUSE

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 a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including 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 of a child, though it may occur alone.

11.4.3 SEXUAL ABUSE

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

The sexual abuse of children by other children is a specific safeguarding issues in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. (KCSIE page 11)

11.4.4 NEGLECT

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

11.4.5 Some signs that may indicate Child Abuse – A general checklist for All Staff:

Repeated or unexplained injuries
Burns, bruises, welts, scars or cuts that are not consistent with the explanation of the injury
Multiple hospitalisations or accidents and Emergency Department visits
Caregiver delays in seeking care for injured child
Child is extremely frightened around adults
Child shows extremely violent and delinquent behaviours
Child is made to feel he/she doesn't belong by caregiver
Child has apparent pain in sitting or walking
Child has spotted or stained clothing
Child itches or scratches excessively in the genital area
Child has loss of appetite
Child has sleep disturbances such as nightmares, fear of going to bed, fear of sleeping alone or frequently waking up during the night
Child engages in sexual play with friends or dolls
Child cannot form stable and lasting relationships with other children
Unrealistic expectations are put upon child by the caregiver
Use of explicit or inappropriate sexual language
Truancy/ running away

11.4.6 PHYSICAL ABUSE:

Physical abuse is actual or attempted physical injury to a child, under the age of 18 years, includes the administration of toxic substances, where there is definite knowledge, or reasonable suspicion, that the injury was inflicted or knowingly not prevented. Harm may be caused by the abuse itself and the context for example if it takes place in a wider context of family conflict or domestic violence.

Signs of Possible Physical Abuse:

Unexplained injuries or burns, particularly if they are recurrent
Improbable excuses given to explain injuries
Untreated Injuries
Bald patches
Withdrawal from physical contact - flinching
Arms and legs kept covered in hot weather
Fear of returning home
Fear of medical help
Self-destructive tendencies
Aggression towards others
Running away
Poor hygiene
Unkempt appearance
Learning difficulties
Lack of self esteem
Poor coping skills
Socio-emotional immaturity

This list gives examples of possible signs. It is not comprehensive. Be alert and use your professional judgement in assessing potential risks

11.4.7 EMOTIONAL ABUSE:

Emotional abuse is the failure to provide for the child's basic emotional needs so as to have a severe effect on the behaviour and development of the child. Emotional abuse is present at some level, in all forms of abuse, and is potentially the most serious form of abuse. The exposure to emotional abuse within the family may produce one or more of the signs outlined below;

Signs of Possible Emotional Abuse:

Physical, mental and emotional development lags
Over-reaction to mistakes
Continual self - deprecation
Sudden speech disorders
Fear of new situations
Inappropriate emotional responses to painful situations
Neurotic behaviour (for example rocking, hair - twisting, thumb sucking)
Self-harm / Self-mutilation
Fear of parents being contacted
Extremes of passivity or aggression
Drug/solvent abuse
Running away
Compulsive stealing, scavenging
Short stature
Poor hygiene
Unkempt appearance
Learning difficulties
Lack of self esteem
Poor coping skills
Socio-emotional immaturity

This list gives examples of possible signs. It is not comprehensive. Be alert and use your professional judgement in assessing potential risks.

11.4.8 NEGLECT:

Neglect occurs when a child's physiological needs are not met and this is likely to cause impairment to physical or emotional health and development.

Signs of Possible Neglect:

Constant hunger
Poor Hygiene and/or smelly
Constant tiredness
Poor state of clothing
Emaciation
Frequent lateness or non- attendance at school
Untreated medical problems
Destructive tendencies
Neurotic behaviour
Poor social relationships
Running away
Compulsive stealing or scavenging
Returning home to empty home
Short stature
Poor hygiene
Unkempt appearance

Learning difficulties
Lack of self esteem
Poor coping skills
Socio-emotional immaturity
Non-organic failure to thrive - failing significantly to reach normal growth and development milestones

This list gives examples of possible signs. It is not comprehensive. Be alert and use your professional judgement in assessing potential risks.

11.4.9 SEXUAL ABUSE

Any child below the age of 18 years may be deemed to have been sexually abused when any person, or persons, by design or neglect, exploits the child, directly or indirectly, in any activity intended to lead to the sexual arousal or other forms of gratification of that person or any other person(s), including organisational networks. This definition holds whether or not there has been genital contact and whether or not the child is claimed to have initiated the behaviour.

Signs of Possible Sexual Abuse:

Few or no friends of own age
Inappropriate play with dolls and peer groups
Having more money than normal (bribes)
Unable to stay awake at school
Withdrawn
Drug, alcohol or other substance abuse
Under achieving at school
Over achieving at school
Truancy
Low self esteem
Sexually transmitted disease
Running away
Fearful of men or adults generally
Suicide attempts
Child tells someone
Decrease in school performance
Poor concentration
Sexualised behaviour
Anxiety/Depression
Eating disorder
Sleep disturbance
Self-destructive behaviour
Mutilation/overdose
Substance abuse
Promiscuity
Prostitution
Psychiatric illness
Pregnancy
Bruising

This list gives examples of possible signs. It is not comprehensive. Be alert and use your professional judgement in assessing potential risks.

11.5 PREVENT guidance (From [Revised Prevent Duty Guidance: for England and Wales](#))

Schools and registered childcare providers (excluding higher and further education).

57. In England about eight million children are educated in some 23,000 publicly-funded and around 2,400 independent schools. The publicly funded English school system comprises maintained schools (funded by local authorities), and academies (directly funded by central government). In Wales, over 450,000 children attend Local Authority maintained schools, and there are 70 independent schools.

58. All publicly-funded schools in England are required by law to teach a broad and balanced curriculum which promotes the spiritual, moral, cultural, mental and physical development of pupils and prepares them for the opportunities, responsibilities and experiences of life. They must also promote community cohesion. Independent schools set their own curriculum but must comply with the Independent School Standards, which include an explicit requirement to promote fundamental British values as part of broader requirements relating to the quality of education and to promoting the spiritual, moral, social and cultural development of pupils. These standards also apply to academies (other than 16-19 academies), including free schools, as they are independent schools. 16-19 academies may have these standards imposed on them by the provisions of their funding agreement with the Secretary of State.

59. In Wales, independent schools set their own curriculum, but must comply with Independent Schools Standards made by the Welsh Ministers. These Standards also include a requirement to promote the spiritual, moral, social and cultural development of pupils.

60. Early years providers serve arguably the most vulnerable and impressionable members of society. The Early Years Foundation Stage (EYFS) accordingly places clear duties on providers to keep children safe and promote their welfare. It makes clear that to protect children in their care, providers must be alert to any safeguarding and child protection issues in the child's life at home or elsewhere (paragraph 3.4 EYFS). Early years providers must take action to protect children from harm and should be alert to harmful behaviour by other adults in the child's life.

61. Early years providers already focus on children's personal, social and emotional development. The Early Years Foundation Stage framework supports early years providers to do this in an age appropriate way, through ensuring children learn right from wrong, mix and share with other children and value other's views, know about similarities and differences between themselves and others, and challenge negative attitudes and stereotypes.

62. This guidance should be read in conjunction with other relevant guidance. In England, this includes Working Together to Safeguard Children, Keeping Children Safe in Education and Information Sharing: Her Majesty's Government advice for professionals providing safeguarding services to children, young people, parents and carers.

[Working Together to Safeguard Children.](#)
[Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)

63. This paragraph is not applicable to PLC

64. The authorities specified in paragraph 65 below are subject to the duty to have due regard to the need to prevent people from being drawn into terrorism. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

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Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

The Prevent duty is not intended to limit discussion of these issues. Schools should, however, be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

These duties are imposed on maintained schools by sections 406 and 407 of the Education Act 1996. Similar duties are placed on the proprietors of independent schools, including academies (but not 16-19 academies) by the Independent School Standards.

Education and childcare specified authorities

65. The education and childcare specified authorities in Schedule 6 to the Act are as follows:

- the proprietors of maintained schools, non-maintained special schools, maintained nursery schools, independent schools (including academies and free schools) and alternative provision academies
- Pupil referral units
- registered early years childcare providers
- registered later years childcare providers
- Providers of holiday schemes for disabled children
- Persons exercising local authority functions under a direction of the Secretary of State when the local authority is performing inadequately; and
- persons authorised by virtue of an order made under section 70 of the Deregulation and Contracting Out Act 1994 to exercise a function specified in Schedule 36A to the Education Act 1996.

66. In fulfilling the new duty, we would expect the specified authorities listed above to demonstrate activity in the following areas.

Risk assessment.

67. Specified authorities are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This should be based on an understanding, shared with partners, of the potential risk in the local area.

68. Specified authorities will need to demonstrate that they are protecting children and young people from being drawn into terrorism by having robust safeguarding policies in place to identify children at risk, and intervening as appropriate. Institutions will need to consider the level of risk to identify the most appropriate referral, which could include Channel or Children's Social Care, for

example. These policies should set out clear protocols for ensuring that any visiting speakers – whether invited by staff or by children themselves – are suitable and appropriately supervised.

Working in partnership

69. In England, governing bodies and proprietors of all schools and registered childcare providers should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board (LSCB).

Staff training

70. Specified authorities should make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups. They should know where and how to refer children and young people for further help. *Prevent* awareness training will be a key part of this.

IT policies

71. Specified authorities will be expected to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering.

Monitoring and enforcement

72. The Office for Standards in Education, Children's Services and Skills (Ofsted) inspects the specified authorities in England listed above, with the exception of some privately funded independent schools. When assessing the effectiveness of schools, Ofsted inspectors already have regard to the school's approach to keeping pupils safe from the dangers of radicalisation and extremism, and what is done when it is suspected that pupils are vulnerable to these. Maintained schools are subject to intervention, and academies and free schools may be subject to termination of their funding agreement, if they are judged by Ofsted to require significant improvement or special measures, or if they fail to take the steps required by their local authority, or for academies or free schools by the Secretary of State pursuant to their funding agreement, as applicable, to address unacceptably low standards, serious breakdowns of management or governance or if the safety of pupils or staff is threatened.

73. Ofsted inspects 16-19 academies under the Common Inspection Framework for further education and skills.

74. Privately funded independent schools in England are inspected by Ofsted or one of three independent inspectorates. In Wales, Estyn inspects independent schools. If they fail to meet the Independent School Standards, they must remedy the problem or be subject to regulatory action by the Department for Education or the Welsh Government, which could include de-registration (which would make their continued operation unlawful).

75. Early education funding regulations in England have been amended to ensure that providers who fail to promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs do not receive funding from local authorities for the free early years entitlement.

76. Ofsted's current inspection framework for early year's provision reflects the requirements in the Statutory Framework for the Early Years Foundation Stage.

11.6 Forced marriage

Although this chapter is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities, much of the guidance and information within will apply to staff working in other educational establishments.

Background

Young people, especially girls who are forced to marry, or those who fear they may be forced to marry, are frequently withdrawn from education, restricting their educational and personal development. They may feel unable to go against the wishes of their parents and consequently may suffer emotionally, often leading to depression and self-harm. These factors can contribute to impaired social development, limited career and educational opportunities, financial dependence and lifestyle restrictions.

Staff may become aware of a student because they appear anxious, depressed and emotionally withdrawn with low self-esteem. They may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia. Sometimes they may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol. Often students' symptoms can be exacerbated in the periods leading up to the holiday season. Staff may wish to be particularly vigilant in that period.

Students may present with a sudden decline in their performance, aspirations or motivation. Some female students may feel studying is pointless if they are going to be forced to marry and therefore be unable to continue with their education.

There may be occasions when a student comes to school or college but then absents themselves from lessons. Often young people at risk of forced marriage are living in virtual imprisonment. They may be subject to excessive restrictions and control at home. Some students may not be allowed to attend any extra-curricular or after school activities. Girls and young women may be accompanied to and from school/college, and even during lunch breaks. Therefore, school time is their only "free" time to do ordinary adolescent activities that other students do at weekends with their friends.

Some students may stop attending school or college and visits to the home by welfare officers or other members of staff may result in the professional being told that the student is out of the country. In some cases, the student may have been locked in a room of the house and not allowed to communicate with anyone outside.

Other students may show a decline in punctuality, especially if they are past compulsory education age, which may be the result of having to "negotiate" their way out of the house. Some students, particularly girls, are given minimal time to get to school so they do not have time to meet a boyfriend or talk to friends. There are occasions when older siblings (usually brothers) and cousins keep a close eye on girls to make sure that they do not meet anyone or talk to friends.

Some students may come to notice because their homework is incomplete or appears rushed. This may be the result of being actively discouraged from doing it by family members. These students may do their homework late at night, which frequently shows in school because they are lethargic, unable to concentrate and have a general appearance of tiredness.

Staff may become aware of conflict between the student and their parents about whether the student will be allowed to continue their education. Sometimes there may be family disputes over whether the student can make applications to colleges or universities, and the distance of the college or university from the family home.

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Another warning sign might be a family history of older siblings leaving education early and marrying early. Their parents may feel it is their duty to ensure that children are married soon after puberty in order to protect them from sex outside marriage. In these cases, there may be a history of considerable absence authorised by the student's parents. These absences may be for sickness, or extended family holidays overseas often interrupting the school term.

Students who fear they may be forced to marry often come to the attention of, or turn to, a teacher, lecturer or other member of staff before seeking help from the police or social services. Sometimes the student's friends report it to staff. Teachers, lecturers and other members of staff are in an ideal position to identify and respond to a victim's needs at an early stage. They can offer practical help such as referring the student to social services or to local or national support groups, but also by providing them with information about their rights and choices.

Educational establishments should aim to create an "open environment" where students feel comfortable and safe to discuss the problems they are facing - an environment where forced marriage is discussed openly within the curriculum, and support and counselling are provided routinely. Students need to know that they will be listened to and their concerns taken seriously. Staff in special schools need to be aware of potential warning signs for pupils.

How education professionals can help:

Signposting where appropriate forced marriage materials on further support and advice can be accessed.

Displaying relevant information e.g. details of the NSPCC Helpline, Child Line, and appropriate local and national support groups on forced marriage.

Ensuring that a private telephone is made available should students need to seek advice discreetly.

Educating teachers, lecturers and other staff about the issues surrounding forced marriage and the presenting symptoms – appropriate training should be included in continuing professional development(CPD).

Referring students to an education welfare officer, pastoral tutor, learning mentor or school counsellor as appropriate.

Encouraging young people to access appropriate advice, information and support.

If you suspect a student is being forced into marriage:

- Speak to the student about your concerns.
- Follow the general action as set out in **chapter 4** of [Multi-agency practice guidelines](#):
- Collect as much as possible of the information required in **chapter 5** of [Multi-agency practice guidelines](#):
- Refer to warning signs in **section 3.13** of [Multi-agency practice guidelines](#):
- Liaise with the DSL as appropriate.

If you have concerns for the safety of a student under 18 years old, activate local child safeguarding procedures and use existing national and local protocols for multi-agency liaison with police and children's social care.

Establish if the student has dual nationality as they may have two passports.

Seek advice from the Forced Marriage Unit.

DO NOT :

Treat such allegations merely as a domestic issue and send the student back to the family home.

Ignore what the student has told you or dismiss out of hand the need for immediate protection.

Decide that it is not your responsibility to follow-up the allegation.

Approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concerns and may place the student in danger.

Contact the family in advance of any enquiries by the police, the Forced Marriage Unit, adult or children's social care, either by telephone or letter.

Share information outside information sharing protocols without the express consent of the student.

Attempt to be a mediator or encourage mediation, reconciliation, arbitration or family counselling.

Establish if there is a history of siblings being forced to marry.

Consider speaking to the student's friends.

There may be occasions when an Education Welfare Officer (EWO) or teacher visits the family in the UK to find out why the student is not attending school or college. The family may tell the EWO or teacher that the student is being educated overseas. Sometimes, the family may suggest that the EWO or teacher speaks to the student on the telephone. If this occurs, the EWO or teacher should refuse to speak on the telephone and (if the student is a British national) insist that the student is presented at the nearest British Embassy or High Commission. There have been occasions when students have not been able to talk freely over the telephone or a different individual has spoken to the EWO or teacher.

For further information, refer to the statutory guidance for local authorities in England to identify children not receiving a suitable education.

DO NOT:

- **Remove the student from the register without first making enquiries and referring the case to Police and Local Authority Adult or Children's social care.**
- **Dismiss the student as taking unauthorised absence.**

11. 7 Allegations against Staff (and 'whistle blowing')

Report the incident immediately verbally and later in writing, to Louise Leader (the Head Teacher). Include time, date and names of those involved. Louise Leader will advise the Chair of Management Committee.

If the allegation involves Louise Leader or a member of the SLT you should report it immediately to the Chair of the management Committee who will advise the Local Authority Designated Officer :
Tina Wilson 01454 868508

(Chair of FMC email address is available in the staff room on the Safeguarding notice board)



Maintain confidentiality and guard against publicity while an allegation is being considered or investigated.
Follow local information sharing protocols.



If at any time, you feel that an allegation has not been dealt with or is not being dealt with properly, you should contact the Local Authority Designated Officer: Tina Wilson 01454 868508

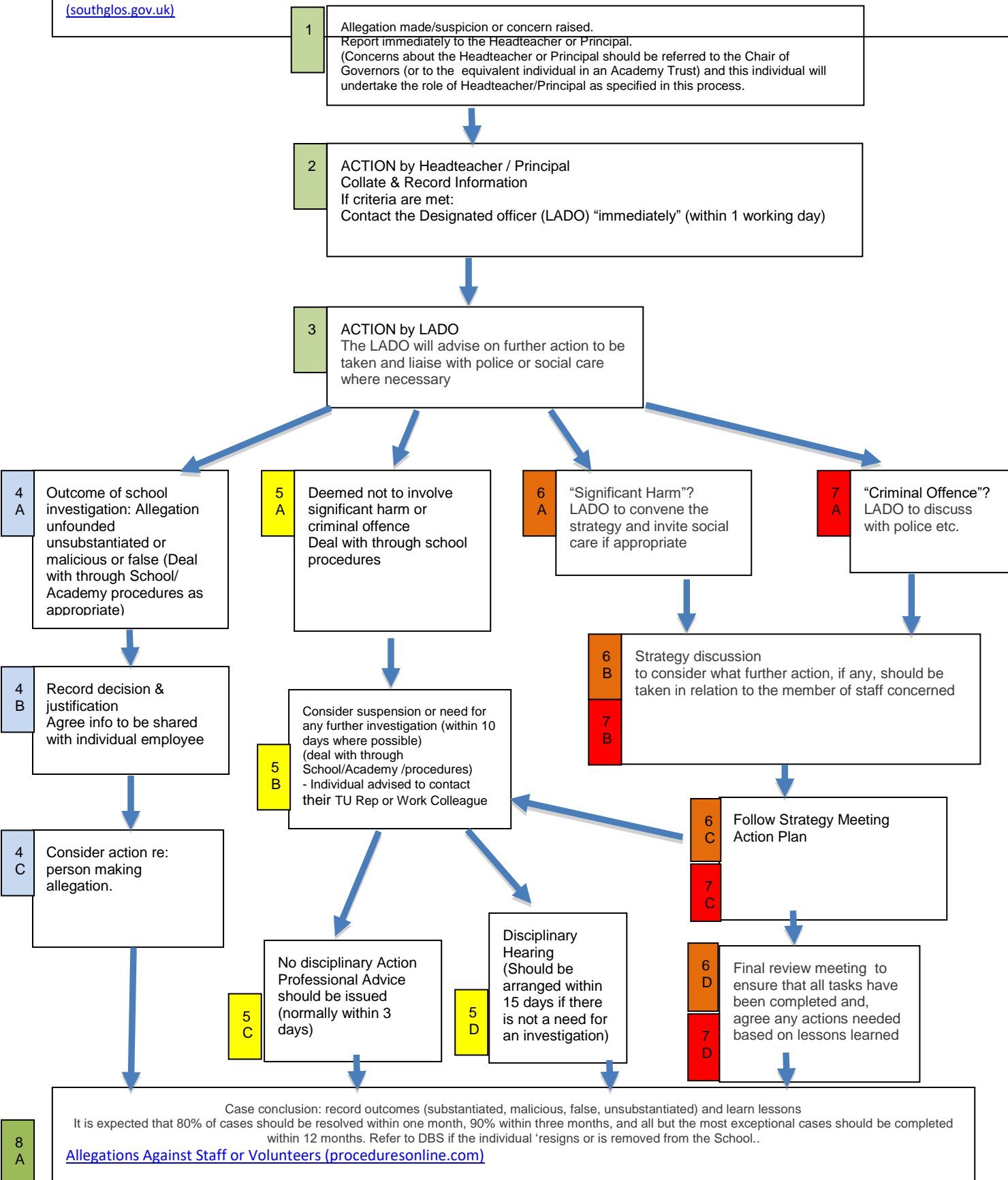


If at any time, you have concerns that actions relating to safeguarding have not been followed in accordance with PLC procedures, please contact the Local Authority Designated Officer (as above) and refer to the South Gloucestershire Whistle Blowing Policy.

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Flow chart for review of process of managing an allegation of abuse by a member of staff or volunteer

[SOUTH-GLOS-PROCEDURES-FOR-MANAGING-ALLEGATIONS-AGAINST-PEOPLE-WORKING-WITH-CHILDREN-Final.pdf \(southglos.gov.uk\);LADO-FLOWCHART.pdf \(southglos.gov.uk\)](#)



SECTION 5

12.0 - Appendix – Additional safeguarding procedures

This section of the policy outlines further guidance and additional information regarding **wider school management and support systems**, which are in place to protect children and young people.

- All relevant Policies can be found on the PLC staff shared drive J:\Policies
- Safeguarding guidance documents can be found on the PLC staff shared drive at: J:\Child Protection and Safeguarding

12.1 - Staff Induction

PLC recognises the importance of Induction and Training. All new members of staff receive induction training, which will give an overview of the organisation and ensure they know its purpose, ethos, services and structure. This will include a 1:1 session with Laura Spires who will explain PLC Safeguarding and Child Protection procedures, MyConcern, relevant documentation including Keeping Children Safe In Education 2021 and this policy, as well as checking CP certification, and arranging online training if necessary.

12.2 - Training - Safeguarding team

The DSL and DDSL's and other members of the safeguarding team are all trained to the Advanced level and undertake Prevent awareness training. In addition to this formal training, their knowledge and skills should be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role. This might be via formal training, e-bulletins, attendance at termly PLC Safeguarding meetings, discussions with other safeguarding staff, or taking time to read and digest safeguarding developments, as they occur.

Laura Spires keeps a record of all staff and their training certificates.

12.3 - Training - Agency staff

Agency staff have undergone the same 'Safer recruitment checks' via their agency, as directly employed staff. All necessary documents are checked prior to anyone working with CYP.

On the first day of employment at PLC, **all** new agency staff are given a document to read and sign before being allowed beyond the reception area. This document gives a brief outline of our policies and procedures and identifies significant staff involved in Safeguarding and Child protection. (See 11.1). This document is stored, along with DBS and identity details with the Single Central Register, which is administered by the head teachers personal assistant (Julie Jones) and the School Business Manager.

The School Business Manager will contact Laura Spires when the number of sessions/day worked by an individual exceeds 30 sessions or 15 full days. (The number of sessions/days is set by the Management Committee and is subject to review, at least annually, via renewal of this policy).

At this point, the agency worker will be asked to provide a current Child Protection Certificate. If they cannot, Laura Spires arrange for them to complete an online training course entitled 'Awareness of

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Child Abuse and Neglect'. The agency worker will be expected to complete the online training in their own time and within a set time, usually 3 weeks.

When the agency worker has completed the course, Laura Spires will hold a copy of their certificate and their name will be added to the Staff CP Training file, available at: [J:\Child Protection and Safeguarding\CP Training Records](#)

For agency staff working for less than the set number of sessions/days, then the DDSL's will endeavour to contact the new agency worker to ensure that they are aware of our expectations and reporting procedures. As a minimum, they will receive the guidance material on their first day as outlined in 11.1.

12.4 - The Single Central Record (SCR)

The Single Central Record records details of;

- Staff names.
- Their date of birth.
- Their Data Barring Service Certificate number and clearance date.
- Their right to work in the UK
- Their identification check details.

It is an essential part of Safer recruitment duties and it is managed by the School Business Manager and overseen by the DSL. The Chair of the Management Committee and the DSL monitor the SCR regularly. The SCR is maintained in accordance with current DfE and OFSTED guidance.

12.5 - Safe Recruitment (see separate Recruitment and Vetting Policy for more details)

- We follow all guidance in Keeping Children Safe in Education, September 2021.
- We ensure that at least one member of each recruitment panel has undertaken all appropriate recruitment training as required by the DfE.
- Our selection and recruitment practices include all appropriate checks on staff and suitability including Disclosure and Barring Service checks.

12.6 - Storing and retention of safeguarding records

Safeguarding and child protection records are kept securely in high security locked cabinets. They can only be accessed by the DSL and DDSLs.

Detailed digital records of all concerns relating to Child Protection are stored centrally on MyConcern. All staff have a login and password, but only and only the DSL and DDSL's have full access to the system.

Child protection records will not be placed in the child's central file. However, a copy of the 'notification of safeguarding concern' should be placed in the central paper file for any PLC student about whom a MyConcern entry has been logged.

At the end of a student's schooling all Child Protection records will be archived as necessary, in accordance with the 1998 Data Protection Act paragraph 2.4.8.

In case of allegations against staff, records will be kept for ten years or until the staff concerned reach statutory retirement age, whichever is shortest.

If a student transfers to another school, then as soon as possible, Child Protection records will be sent by secure post to the Designated Safeguarding Lead of the receiving school.

All Staff confirm that they have read and understood the latest guidance on safeguarding in schools. This is repeated annually. A record of their confirmation is kept by Laura Spiers for the school as a whole, and individual confirmation signatures are held in individual personnel records.

12.7- Working with other agencies

We recognise the importance of multi-agency working. We will ensure that staff are able to attend all relevant meetings including case conferences, core groups and strategy meetings where possible. We understand that we continue to play a role after referral and continue to develop strong links with partner agencies, particularly social care. Where necessary, outside agencies will be invited into MyConcern by a member of the safeguarding team, so that the outside agency staff get updates as soon as they are made. Staff from outside agencies will only have limited access to individual concerns.

12.8 - Malicious allegations

Students that are found to have made malicious allegations have breached the school rules. PLC will therefore consider whether to apply an appropriate sanction. If the school deems it appropriate, the matter may be passed onto the Police, if there are grounds for believing a criminal offence may have been committed.

12.9 - Allegations against staff

Staff are encouraged, to adopt the mentality of 'what's the worst that could happen here' and are made aware of whistle blowing procedures through staff training. In addition the NSPCC whistleblowing helpline is available to staff, but staff are VERY STRONGLY advised to follow PLC procedures in the first instance (see 11.7).

12.10 - Complaints from a member of the public or a parent

If you are contacted by someone outside school expressing concern about safety of a child or concerns about a member of staff, please ensure that the DSL and DDSL's are aware that you have been contacted and seek their guidance before you give information or take action. In their absence, all complaints should go to a member of SLT. If the complaint is about the DSL, refer to Tina Wilson, the LADO on 01454 868508.

Remember to take contact details of the caller and arrange to phone them back.

12.11 - Intimate Care

All children have a right to safety, privacy and dignity when contact of an intimate nature is required (for example assisting with toileting or removing wet/soiled clothing). A care plan should be drawn up and agreed with parents for all children who require intimate care on a regular basis. Children should be encouraged to act as independently as possible and to undertake as much of their own personal care as is practicable. When assistance is required, staff should ensure that another appropriate adult is in the vicinity and is aware of the task to be undertaken.

Additional vulnerabilities that may arise from a physical disability or learning difficulty should be considered with regard to individual teaching and care plans for each child. As with all arrangements for intimate care needs, agreements between the child, their parents/carers and the organisation must

be negotiated, agreed and recorded. In addition, the views and/or emotional responses of children with special educational needs, regardless of age and ability must be actively sought in regular reviews of these arrangements.

12.12 - Physical Contact

There are occasions when it is essential for staff to have physical contact with students, **but it is crucial that they only do so in ways appropriate to their professional role (e.g. when teaching gymnastics, music tuition, giving first aid etc.)**

Students who have suffered violence, abuse or neglect are likely to react to physical contact unpredictably, and since information is only shared on a need to know basis, **staff should assume that it is in the best interest of themselves and the child not to make physical contact.** It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. **Staff must use their professional judgement at all times.**

On the infrequent occasions when it is necessary to make physical contact, this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity and background. Appropriate physical contact in schools may occur most often with younger students.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible in the school's bound and numbered book and, if appropriate, a copy placed on the child's file.

Physical contact, which occurs regularly with an individual child or young person, is likely to raise questions unless the justification for this is part of a formally agreed plan (for example in relation to students with SEN or physical disabilities). Any such contact should be the subject of an agreed and open school process and subject to review. Where feasible, staff should seek the child's permission before initiating contact. Staff should listen, observe and take note of the child's reaction or feelings and – so far as is possible - use a level of contact which is acceptable to the child for the minimum time necessary.

Extra caution may be required where it is known that a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse. It is recognised that many such children are extremely needy and seek out inappropriate physical contact. In such circumstances staff should deter the child sensitively by helping them to understand the importance of personal boundaries.

The general culture of 'limited touch' should be adapted, where appropriate, to the individual requirements of each child.

12.13 - Positive Handling and the use of reasonable force.

PLC follows DfE guidelines on Use of Reasonable Force July 2013, available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/268771/use_of_reasonable_force_-_advice_for_headteachers_staff_and_governing_bodies_-_final_july_2013_001.pdf

The term 'reasonable force' covers the broad range of actions used by most teachers at some point in their career that involve a degree of physical contact with pupils. Force is usually used either to control or restrain. This can range from guiding a pupil to safety by the arm through to more extreme

circumstances such as breaking up a fight or where a student needs to be restrained to prevent violence or injury. 'Reasonable in the circumstances' means using no more force than is needed.

See the PLC 'Positive handling policy' for further guidance.

12.14 - Social Contact

Staff should not establish or seek to establish social contact with children for the purpose of securing a friendship or to pursue or strengthen a relationship. Even if a child seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise their professional judgement in making a response and be aware that such social contact could be misconstrued.

Staff should not give their personal details such as home/mobile phone number; home or e-mail address to children. Staff should only use their school email address to communicate with children and their families and school e-mail systems should only be used in accordance with school policy.

Staff should not accept friend requests or similar from children on their personal social media accounts and should be mindful of the impact of the online presence on their professional reputation.

Detailed guidance for staff can be sought from [The Safer Internet Centre](http://www.saferinternet.org.uk/advice-centre/teachers-and-professionals/professional-reputation) available at: <http://www.saferinternet.org.uk/advice-centre/teachers-and-professionals/professional-reputation>.

See also 12.24 – on line safety.

12.15 - Transporting Children

Always use a school owned vehicle if one is available and if possible with one adult additional to the driver, acting as an escort.

However there are occasions when private transportation is necessary. Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and insured for business use (Business Class 1 or 2) and that the maximum capacity is not exceeded.

Where transport in private vehicles is required at short notice (e.g. Child is taken ill and needs to go home, or a taxi fails to collect a child), the use of a private vehicle must be discussed and agreed with a member of the SLT. A note must be made on SIMS register, during the lesson by the class teacher, from which the student was taken home. The note should state who the driver was, and which member of SLT sanctioned the transport. If this occurs beyond the end of the working day, admin staff should add these details as a comment, to the last lesson on the student's timetable.

12.16 - First Aid

In PLC, there are always trained members of staff who oversee First Aid.

- All First Aiders will be easily identified on the First Aid sign in the Reception Office
- The position of First Aid kits will be clearly marked with a 'First Aid point' sign on the door of the room where they are stored

When a child is ill, or has suffered an accident in school or on the playground there is a protocol for staff to follow:

- A trained first aider is consulted and appropriate action taken

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- If there is any concern regarding the child's condition, a parent or carer will be contacted
- The incident is logged in the accident book. The incident is placed in the student/staff's personal file and a digitally entry is made in a spreadsheet held by the Admin team

Children will only be allowed home, in the event of illness, with the permission of adults with parental responsibility.

12.17 - Administration of Medicines

If a pupil requires **ANY** short or long term medication, this will only be administered by a nominated first aider or designated/named member of staff. This will ensure no duplication of medication occurs. The nominated lead for this is **Rhian Kempson**.

A Medical Action Plan **must be in place** for this to happen and it must be agreed between the pupil, the Parents/Carers and PLC. This will include details of all medication to be given, including times, doses and any additional details. A record of what medication has been given will be accurately kept and signed by the member of staff administering the medication and one other witnessing adult. The Medical Action Plan will be stored with the medication signing sheet.

All medication must be stored in the original container and must have been prescribed only for the student. It must be in date. Out of date medication must be disposed of correctly, by taking to a pharmacy or hospital.

All prescription medication, will be stored under lock and key, except medication for anaphylaxis and certain others as decided by Rhian Kempson, which will be stored in an unlocked cabinet.

12.18 - Attendance. (See Attendance Policy for further detail)

PLC actively encourages and motivates pupils to meet the school attendance target of 95%.

When children are unwell parents are expected to confirm absence by telephone. If there is no notification, school has a policy of phoning home to ascertain each child's whereabouts. The school works closely with contracted Education Welfare officer whenever a child's attendance and/or punctuality causes concern. Attendance rates are reported each term to the LA, annually to the government, to the Management Committee and to all parents.

Positive measures are in place to encourage children to attend regularly and punctually and the school is aware of its right to take legal action against parents who do not ensure good attendance and punctuality. PLC has an open door policy so that if parents have any concerns regarding attendance, we will happily work together to support the young person's attendance.

12.19 - Health and Safety. (See Health and Safety Policy for further detail)

The delegated members of the Management Committee for Health and Safety is Guy Halley, supported by **Mr Martin Elvy** (SBM).

The school has a Health and Safety policy, which is monitored regularly by the PLC Management Committee. Although, the Head teacher, the School Business Manager, and the Management Committee oversee the policy, every member of staff has a commitment and responsibility to health safety in the workplace.

Staff concerns should be reported to the Site Manager. The Site Manager will then carry out an initial examination, assessing what remedial action needs to take place. In the absence of the Site manager,

concerns should be reported to the School Business Manager. If neither is available, concerns should be reported to the Head teacher.

Each term there is a timed fire drill that practices efficient evacuation from the buildings.

Risk assessments - These include academic activities such as Science, Art, Design Technology, Sports and offsite educational activities such as Forest School, College placements, Early College taster sessions, and Outdoor education provision, purchased from external agencies. Where the activity is offsite, the risk assessments will be written in line with the PLC Trips Policy, which is based on documentation issued by South Glos in October 2015.

12.20 - Anti bullying Policy (See Anti Bullying policy and Cyber bullying Policy)

Bullying is: "A systematic and extended victimisation of a person or group, by another or group of others." The schools response to this is unequivocal.

Staff must be informed immediately and action will take place. The school will also ensure that bullying is identified and dealt with so that any harm caused by other pupils can be minimised.

BULLYING IN ANY FORM WILL NOT BE TOLERATED AT PLC

It is EVERYONE'S responsibility to prevent bullying and ensure that something is done about it if it does occur. All PLC staff are alert to the potential for bullying amongst our pupils. Special care is taken, therefore, to monitor movements around the school – or college – to maximise staff levels at break-times and to inform colleagues or other settings fully of any incidents or suspected incidents. Class teachers and the Senior Leadership Team will ALWAYS investigate such situations.

Incidents of bullying must be reported online via MyConcern, by the member of staff that witnessed the bullying.

Bullying can take a number of forms:-

- Verbal: name-calling, sarcasm, spreading rumours, persistent teasing.
- Physical: pushing kicking, hitting, punching, any form of violence or threats of violence.
- Emotional: tormenting, threatening ridicule, humiliation and exclusion from groups or activities.
- Racist: racial taunts, gestures, graffiti
- Sexual: unwanted physical contact, abusive comments.

12.21 - Relationships Policy (previously called the Behaviour policy)

At PLC we believe in a trauma recovery focused culture which is built around positive relationships and ensuring the individual needs of children and young people are at the heart of everything we do.

Included in the policy :

- our values
- a mutually held set of beliefs regarding how we treat children;
- the belief in recovery from trauma not management of behaviour
- the foundational belief that every child or young person is redeemable
- consistent, emotionally literate responses to children and young people

We are constantly reviewing our Relationships (behaviour) Policy to ensure it is appropriate. The policy is available on the PLC website at: <https://www.pathwayslearningcentre.org.uk/wp-content/uploads/2018/06/PLC-Relationships-policy.pdf>

12.22 - Safeguarding through the curriculum

The curriculum deals with safeguarding in three ways.

1. The curriculum, in subjects such as Personal, Social and Health Education discusses relevant issues with our students. Topics include such themes as Drugs, Sex and Relationships and keeping safe. Children are actively encouraged to explore and openly discuss these issues.
2. The curriculum is designed so that safety issues within the subject are discussed and safe practices taught, such as using equipment properly in various subjects for example PE, ICT, Forest School and Design and Technology.
3. A tutorial programme is delivered weekly, where themed resources are shared with all students. The themes involve Safeguarding, Online safety, Equalities, Physical health and wellbeing, Life skills, Mental health and wellbeing awareness, Spiritual Moral Social and Cultural issues (SMSC), Positive relationships and British Values and the wider world.

At all times there have to be appropriate staffing levels. When off-site activities are undertaken, agreed pupil/adult ratios are maintained. The lead adult always assesses the level of risk for each visit and all trips are finally authorised by the Visits Approval Group. Please see the PLC Trips Policy for further guidance. This is available at: J:\Risk Assessments Trips and Visits\1 Trips Policy.

Visiting speakers, with correct clearance, are always welcome into school so that they can give specialist knowledge to the children.

12.23 - Drugs and Substance misuse

This concerns the use of alcohol, illegal drugs and the misuse, whether deliberate or unintentional, of prescribed drugs and substances such as solvents. The Management Committee recognises its moral and legal duty to provide as safe an environment as possible for all its employees and to ensure the safety of all pupils, other members of the school's staff and the public.

12.24 - Online Safety (See on line Safety policy for further details)

New technologies have become integral to the lives of children and young people in today's society, both in school and in their lives outside school. Technologies open up new learning opportunities for everyone. They can stimulate discussion, promote creativity and effective learning, and improve communications between parents/carers and the school in order to support young people with their learning. Young people have an entitlement to safe internet access. AT PLC we actively encourage children to use the internet as much as is possible to support learning, but at all times in a safe way.

Parents are asked to provide consent for their child to use the internet as part of their child's admission to PLC.

- Pupils should not be left unattended whilst online
- Pupils have a unique login and password for the school IT system
- This login and password can only be changed by teachers and not pupils
- Staff will remain highly vigilant in monitoring password usage, online safety messages and supporting young people to understand the importance of this requirement
- If staff know of misuse by a pupil the issue should be shared with the member of SLT responsibility for the pupil and/or report it as per other safeguarding concerns

Use of mobile phones to access the internet and all linked platforms.

Safe Guarding and Child Protection Policy. September 2022

A mobile protocol is in place and has been shared with CYP and parents. Pupils do not have permission to access the Internet directly via their 3G/ 4G/ 5G phones/tablets.

- The Online Safety lead for PLC is: **Connie Coppin** (01454 862630)

For further guidance, please see:

- PLC Online safety policy
- PLC Sexting Policy
- Cyber bullying (under consultation)
- Staff Acceptable Use Policy Agreement
- Parent/Carers Acceptable Use Policy Agreement
- Also refer also to South West Safeguarding Board swcpp.org.uk
- These documents are available via the Admin office

12.25 - Photographing children

We understand that parents like to take photos of or video record their children in the school play, or at sports day, or school presentations. This is a normal part of family life, and we will not discourage parents from celebrating their child's successes.

However, if there are Health and Safety issues associated with this - i.e. the use of a flash when taking photos could distract or dazzle the child, and cause them to have an accident, we will encourage parents to use settings on their camera that do not require flash.

We will not allow others to photograph or film pupils during a school activity without the parent's permission.

We will not allow images of pupils to be used on school websites, publicity, or press releases, without express permission from the parent, and if we do obtain such permission, we will not identify individual children by name.

The school cannot however be held accountable for photographs or video footage taken by parents or members of the public at school functions.

Students are not allowed to take photographs of other students or of staff on hand held devices such as mobile phones without the express permission of the person being photographed.

Where staff suspects this has happened, and permission has not been sought or given, the student will be expected to delete such images.

12.26 - Publication Scheme on information available under The Freedom of Information Act

The Management Committee is responsible for maintenance of this scheme.

One of the aims of the Freedom of Information Act 2000 (FOIA) is that public authorities, including all maintained schools, should be clear and proactive about the information they will make public.

At PLC we let parents know the information which we publish or intend to publish, the manner in which the information will be published and whether the information is available free of charge or on payment. Some information which we hold may not be made public, for example personal information. This publication scheme conforms to the model scheme for schools approved by the Information Commissioner.

12.27 - Equalities Duty

PLC adopts the South Glos Equalities statement which Disability, Race and Diversity.

SLT monitor all non-equalities issues weekly, who report to the Management Committee 3x a year.

PLC ensures that equal opportunities are available for everyone, regardless of sex, religion, class and ethnic group or ability range.

Children with disabilities must be able to take a full and active part in every lesson and every measure must be taken to ensure this. The school will work hard to promote racial equality and harmony by preventing and challenging racism. If anyone ever feels unjustly treated then the school welcomes and values a response. Racism and harassment is tackled in the RE and in the PSHE curricula, via the tutorial programme and on an individual basis as required.

All racist incidents will be reported to the Local Authority and Management Committee.

12.28 - Safeguarding of PLC Staff. (See Staff Well Being Policy)

This document sets out our policy on encouraging and enabling all staff to maintain a healthy balance between their work and other interests and responsibilities in their life. The rationale is that:

- a good work life balance is central to staff effectiveness and satisfaction, and pupil learning.
- Work life balance is about helping staff combine work with their personal interests and commitments.

The Management Committee has a statutory responsibility to ensure, the health, safety and wellbeing of all their employees as far as it is reasonably practicable.

12.29- Exams. (See Exams Policy and Procedures)

This document sets out our policy on the support and processes staff need to be following when a pupil is undertaking an exam, both at Pathways Learning Centre and in the home or off site. Please See Appendix 2 of this policy for further details.

12.30 - Site Security See Site Security Policy

PLC provides a secure site, but the site is only as secure as the people who use it. Therefore all people on the site have a duty to adhere to the rules, which govern it. Laxity can cause potential problems to safeguarding.

Therefore:

- All exit doors/gates should be closed to prevent intrusion.
- All main doors have a security system/key fob that can only be opened by staff.
- Visitors must only enter through the main entrance and sign in at the Reception office.
- They should be given a visitors badge on entry and they will be given a copy of the PLC safeguarding leaflet for visitors.
- Children will only be allowed home, in the event of illness, with the permission of adults with parental responsibility.
- Children should only be allowed to leave school during school hours, either if collected by an adult by arrangement. If the students are in Key stage 4, then with written parental permission, they may spend break and/or lunchtimes offsite.
- Should a child leave the school premises without permission then staff will not normally follow. They should report the student's absence immediately to the Reception office.

- After 20 minutes of absence, parents will be informed.
- If the student fails to return or their whereabouts still cannot be established after 20 minutes and we are unable to contact parents, then the police will be called.

12.31 - The use of school premises by other organisations

Where services or activities are provided separately by another body using the school premises during school time with schools students, the management Committee has delegated to the Head teacher and School Business Manager, the responsibility to ensure that appropriate policies and procedures are in place in regard to safeguarding children and child protection.

Where the school premises leases out or lends, free of charge, parts of the school outside normal school hours, then the Head teacher, School Business Manager and Site Manager will assume responsibility.

12.32 - Contracted Services

Where the Management Committee contracts its services to outside providers, we will ensure that these providers have appropriate safeguarding and child protection policies and procedures, and that there are arrangements in place to link with the school on such matters.

This duty of care will be overseen by the School Business Manager and the Site manager.

ALL local Authority staff who visit PLC are deemed to have appropriate levels of Safeguarding training and to have had their DBS status checked and confirmed by the Local Authority. A South Glos identity pass is sufficient proof that these actions have taken place.

12.33 – Searching, screening and confiscation at school.

The latest government guidance on searching, screening and confiscation at school, can be found at this link: [searching, screening and confiscation at school 2018](#)

Item 15 provide additional guidance on ‘dealing with electronic devices’. This section clarifies that staff may lawfully search electronic devices, without consent or parental permission, if there is a ‘good reason’. In determining a ‘good reason’ to examine or erase data or files, the staff member should reasonably suspect that the data or file on the device in question has been, or could be, used to :

- cause harm
- to disrupt teaching
- break the school rules
- commit an offence
- cause personal injury
- Damage property.

Any data, files or images that are believed to be illegal must be passed to the police as soon as practicable, including pornographic images of children, without deleting them.

Any data, files or images that are not believed to be unlawful, may be deleted or kept as evidence of a breach of the school’s behaviour (relationships) policy.

This guidance must be read alongside the UKCCIS guidance, [‘sexting in schools and colleges: responding to incidents and safeguarding young people’ 2017.](#)

12.34 – Resolution of professional differences.

As professionals, we may not always agree on the most effective way of supporting CYP. We will always endeavour to resolve any issues through professional discussion and mutual understanding. However, when this is not possible, we follow the South Glos Policy on the Resolution of Professional Differences.

<http://sites.southglos.gov.uk/safeguarding/wp-content/uploads/sites/221/2015/05/Escalation-Policy-Resolution-of-professional-differences.pdf>