Lawnswood Campus

Safeguarding & Child Protection Policy

2023-2024

Approved by Chair of the Management Committee: Date: 29/09/23

Review Date: Autumn Term 2024

Contents

Important contacts

Lawnswood Campus Safeguarding Contact Details:

Centre / Role	Name	Contact
Lawnswood Campus		
Chair of the Management Board	Mr Bob Stephenson	bstephenson@lawnswoodcampus.co.uk
Management Board Safeguarding Member	Mr Bob Stephenson	bstephenson@lawnswoodcampus.co.uk
Orchard Centre		
DSL	Ms L Watson	LWatson@lawnswoodcampus.co.uk
DDSL + Children & Young People in Care Designated Person	Mr Richard Heathcote	Rheathcote@lawnswoodcampus.co.uk
DDSL	Mrs Louise Kumar	LKumar@lawnswoodcampus.co.uk
Online Safety	Mrs Michelle Murray	mwoosey@lawnswoodcampus.co.uk
Braybrook Centre		
DSL + Children & Young People in Care Designated Person	Mrs Marsha Bowes	MBowes@lawnswoodcampus.co.uk
DDSL	Mr Nathan Nwenwu	NNwenwu@lawnswoodcampus.co.uk
DDSL	Mrs Tracy Porter	TPorter@lawnswoodcampus.co.uk
Online Safety	Mr Harpal Tiwana	HTiwana@lawnswoodcmapus.co.uk
Midpoint Centre		
DSL + Children & Young People in Care Designated Person	Mr Nigel Biddle	nbiddle@lawnswoodcampus.co.uk
DDSL	Mrs Louise Croutear	LCroutear@lawnswoodcampus.co.uk
Online Safety	Mrs Sharon Roberts	SRoberts@lawnswoodcampus.co.uk
Nightingale Home & Hospital		
DSL + Children & Young People in Care Designated Person	Ms L Watson	LWatson@lawnswoodcampus.co.uk
DDSL	Mrs Emma Rushton	ERushton@lawnswoodcampus.co.uk
DDSL (hospital campus room)	Mrs Emma Varnam	EVarnam@lawnswoodcampus.co.uk
DDSL + Online Safety	Mrs Sara Harris	SHarris2@lawnswoodcampus.co.uk

Local Authority Safeguarding Contact Details

Agency / Role	Name / Contact Details
Wolverhampton Safeguarding Together Service	Web: https://www.wolverhamptonsafeguarding.org.uk / Call: 01902 550477 email: wscb@wolverhampton.gov.uk Priory Green Building Whitburn Close Pendeford Wolverhampton WV9 5NJ
Multi-Agency Support Hub (MASH)	Call: 01902 555392 Out of Hours: 01902 555392
Wolverhampton CSE Lead	550523 Sandeep.gill@wolverhampton.gov.uk
Social Care out of hours	552999
Children's Disability Team	550911 childrenandyoungpeople's.disabilityservice@wolverhampton.gov.uk
Adult's Disability Team	**553653** or **556780** Contact through Wolverhampton city council website
Designated Officer/LADO	Kenny Edgar, 550477, LADO@wolverhampton.gov.uk
Prevent – Community Safety Team	01902 551214 Safer@wolverhampton.gov.uk
FGM	101 or 999
Police	11 Option 3 for WMP or 999
Wolverhampton Virtual Campus Head	551039 Darren.Martindale@wolverhampton.gov.uk
Telford and Wrekin Virtual Campus Head	Michelle Salter michelle.salter@telford.gov.uk
Telford and Wrekin Virtual Campus Admin	virtualcampus@telford.gov.uk
Wolverhampton Exploitation Lead	Sandeep Gill, 550523, Sandeep.gill@wolverhampton.gov.uk
NSPCC	Concerned about a child: Call: 0808 800 5000 Whistleblowing helpline: 0800 0280 285 email: help@nspcc.org.uk

NSPCC Whistleblowing helpline -	0800 028 0285 Link available from KCSiE– NSPCC's 'What you can do to report abuse available at: help@nspcc.org.uk
Childline	Call: 0800 1111

1. Aims

The PRUs on the Lawnswood Campus aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare to ensure consistent good practice across the campus.

- All staff are aware of their statutory responsibilities with respect to safeguarding

- Staff are properly trained in recognising and reporting safeguarding issues.

2. Legislation and statutory guidance

The Management Committee of Lawnswood Campus recognises and is committed to fulfilling its statutory responsibility to safeguard and promote the welfare of children in accordance with the following legislation and guidance:

The Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2023) and Working Together to Safeguard Children (2023), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3)'.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on the campus and local authorities to safeguard and promote the welfare of children

- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

- Statutory guidance on the Prevent duty, which explains schools duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our management committee and headteacher should carefully consider how they are supporting their children with regard to these characteristics. The Act allows our campus to take positive action to deal with particular disadvantages affecting children (where we can show it's proportionate). This includes making reasonable adjustments for disabled children. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some children may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

Wolverhampton Safeguarding together:

Quick Links

This contents list is sub divided into the following parts, each part contains relevant Chapters/Procedures linked to the local safeguarding arrangements :

- 1. Statutory Child Protection Procedures
- 2. Regional Safeguarding Guidance
- 3. Local Area Specific Safeguarding Information and Procedures

Please follow: West Midlands Safeguarding Children Group (procedures.org.uk) for all of the above procedures.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment

- Preventing impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.

- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and 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. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos, or live streams.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)

- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA

- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)

- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

- Have English as an additional language

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation Are asylum seekers

- Are at risk due to either their own or a family member's mental health need

- Are looked after or previously looked after (see section 12)

- Are missing or absent from education for prolonged periods and/or repeat occasions

- Whose parent/carer has expressed an intention to remove them from a campus setting to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and management committee in the campus settings and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended campus and off-site activities.

The campus plays a crucial role in preventative education. This is in the context of a whole-campus approach to preparing children for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Positive Behaviour for learning policy

- Positive relationships policy

- Pastoral support systems

- Planned programme relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

    o Healthy and respectful relationships o Boundaries and consent o Stereotyping, prejudice and equality o Body confidence and self-esteem o How to recognise an abusive relationship (including coercive and controlling behaviour)

o The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support.

o What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually (A copy of both documents are made available to all staff on staff noticeboards and via the safeguarding Teams channel)

- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance, understand it and agree to abide by it.

- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

- Provide a safe space for children who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the role and identity of the designated safeguarding lead (DSL) and DDSLs, the Positive Behaviour for Learning policy, online safety including the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education.

- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.

- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.

- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues,

  such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- The fact that children can be at risk of harm inside and outside of their home, at the campus and online

- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children

- What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Leads (DSL)

The DSL's are members of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in their centres. This includes online safety and understanding our filtering and monitoring processes on campus devices and networks to keep children safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns *(Please see contact details in table at the front of this document)* When the DSL is absent, the DDSLs – will act as cover.

The DSL will be given the time, funding, training, resources and support to:
- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our campus The DSL will also:

- Keep the headteacher informed of any issues.

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.

- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the campus's policies

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support

- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and DDSLs are set out in their job description.

5.3 The Management Committee

The Management Committee will:

- Facilitate a whole-campus approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteachers to account for its implementation.

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our campus's local multi-agency safeguarding arrangements.

- Appoint a member of the management committee to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

- Ensure that the campus has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:

  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.

  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the campus in meeting these standards Make sure:

  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.

  - Online safety is a running and interrelated theme within the whole-campus approach to safeguarding and related policies.

  - The DSL has lead authority for safeguarding, including online safety and an understanding of the filtering and monitoring systems and processes in place

  - The campus has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Managing Safeguarding Allegations Policy contained in this policy covers this procedure o That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the campus rolls):

  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed. o Make sure there are arrangements for the body to liaise with the campus staff about safeguarding arrangements, where appropriate

  - Make sure that safeguarding requirements are a condition of using the campus premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

The Chair of Management Committee will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see Managing Safeguarding Allegations Policy).

All Management Committee members will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how the management committee are supported to fulfil their role.

5.4 The Headteacher of each Centre

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.

- Communicating this policy to parents/carers when their child joins the campus and via the campus website

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Managing Safeguarding Allegations Policy)

- Making decisions regarding all low-level concerns, (though they may wish to collaborate with the DSL on this).

- Ensuring the relevant staffing ratios are met, where applicable

- Overseeing the safe use of technology, mobile phones and cameras in the setting

5.5 Multi-agency working

Lawnswood Campus contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.
Our commitment is:

- We, the Leadership Team and the DSL/DDSLs understand our role in the safeguarding partner arrangements

- We co-operate and engage fully with the published safeguarding arrangements

- Lawnswood Campus will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Lawnswood Campus will allow access for children's social care from the host

local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

- That our safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the three safeguarding partners. This will include understanding and reflecting local protocols for assessment and the threshold document along with supplying information as requested by the three safeguarding partners.

6. Confidentiality

Lawnswood Campus adopts the principles outlined in the DfE Information Sharing guidance (July 2018)

We recognise that all matters relating to child protection are confidential. The DSL and DDSLs will disclose any information about a child to other members of staff on a need-to-know basis only. All staff must be aware that they have a professional responsibility to share information with other statutory agencies to safeguard children.

We note that:
- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: -   it is not possible to gain consent.
  - it cannot be reasonably expected that a practitioner gain consent;
  - or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If a victim asks the campus staff not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children • The DSL should consider that:
    - ☐ Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - ☐ The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains Regarding anonymity, all staff will:

  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.

  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in Managing Safeguarding Allegations Policy

7. Recognising abuse and taking action

Staff, volunteers and management committee members must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy (DDSL))".

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

https://www.gov.uk/report-child-abuse-to-local-council

Please follow the following link in regards to Wolverhampton procedures: West Midlands Safeguarding Children Group (procedures.org.uk)

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions Stay calm and do not show that you are shocked or upset

- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Record this immediately on CPOMS.

- recording the disclosure on CPOMS is preferable but we recognise that this is not always possible e.g. if teaching in the home.

- Sign and date the write-up and pass it on to the DSL.

- Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

- Not recognise their experiences as harmful

- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 2 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine children.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

Please follow the following link in regards to Wolverhampton procedures: West Midlands Safeguarding Children Group (procedures.org.uk)

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If, in exceptional circumstances, the DSL is not available, this should not delay appropriate action being taken. Staff will speak to a member of the senior leadership team and/or take advice from local authority children's social care. Advice can also be sought at any time from the **NSPCC helpline on 0808 800 5000**. Share details of any actions taken with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any actions taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the campus will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Please follow the following link in regards to Wolverhampton procedures: West Midlands Safeguarding Children Group (procedures.org.uk)

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which campus staff and management committee members can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. *Note that this is not for use in emergency situations.*

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

- Think someone is in immediate danger

- Think someone may be planning to travel to join an extremist group

- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Many of the pupils on campus are there rather than in their mainstream school due to mental health problems.

Staff will therefore be alert to behavioural signs that suggest a child may be experiencing an additional or changing mental health problem or be at risk of developing one.
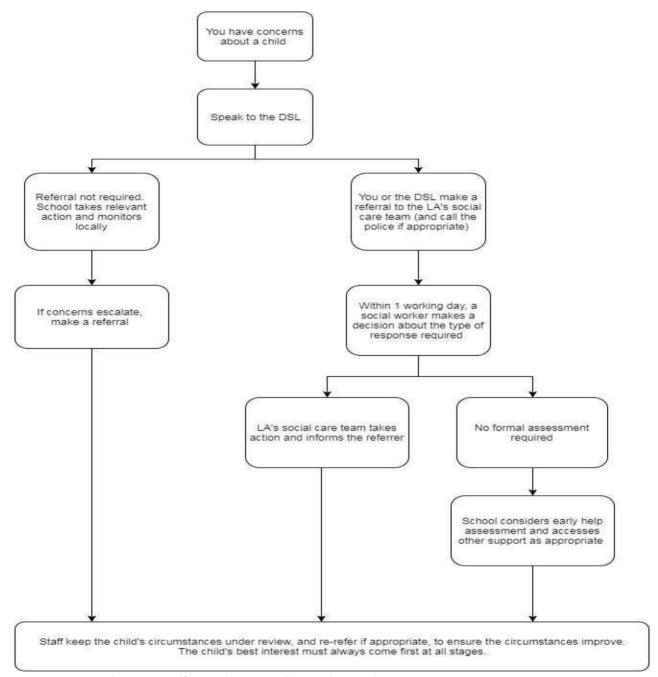
If you have a mental health concern about a child, then that is also a safeguarding concern, and you need to take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

For more information regards to escalation and referrals for mental health support follow - Wolverhampton Specialist CAMHS :: Black Country Healthcare NHS Foundation Trust

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)

7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the Chair of Management Committee.

The headteacher/Chair of Management Committee will then follow the procedures set out in Managing Safeguarding Allegations Policy, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the campus premises for running an activity for children, follow our campus safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other children

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of children hurting other children will be dealt with under our campus's Positive Behaviour for Learning policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence

- Could put children in the campus at risk

- Is violent

- Involves children being forced to use drugs or alcohol

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 2 for more information about child-on-child abuse. **Procedures**

for dealing with allegations of child-on-child abuse If a pupil makes an

allegation of abuse against another pupil:

- You must record the allegation (preferably on CPOMS) and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering campus transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment on campus and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female children, and initiation or hazing type violence with respect to boys

- Ensure our curriculum helps to educate children about appropriate behaviour and consent

- Ensure children are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

- Ensure staff reassure victims that they are being taken seriously

- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

- That even if there are no reports of child-on-child abuse in campus, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

    - Children can show signs or act in ways they hope adults will notice and react to

    - A friend may make a report

    - A member of staff may overhear a conversation

    - A child's behaviour might indicate that something is wrong

    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it

- That they should speak to the DSL if they have any concerns

- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our campus from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

- `There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

- Delete the imagery or ask the pupil to delete it

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

- Say or do anything to blame or shame any young people involved

- You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate campus staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)

- If a referral needs to be made to the police and/or children's social care

- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

- What further information is required to decide on the best response

- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

- Whether immediate action should be taken to delete or remove images or videos from devices or online services

- Any relevant facts about the children involved which would influence risk assessment If there is a need to contact another campus, college, setting or individual

- Whether to contact parents or carers of the children involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN

- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

- The imagery involves sexual acts and any pupil in the images or videos is under 13

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or selfharming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If, at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the children involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the centre's DSL or DDSL by contacting our police community support officer or dialling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Children are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSHE and IT/computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is

- How it is most likely to be encountered

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

- Issues of legality

- The risk of damage to people's feelings and reputation

Children `also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images

- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with children so they are aware of the processes the campus will follow in the event of an incident.

7.10 Reporting systems for our children

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring children feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for children to confidently report abuse

- Ensure our reporting systems are well promoted, easily understood and easily accessible for children

- Make it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback

- Children are aware of: the reporting systems in place and who they should report concerns to

- Children are made aware of the reporting systems and processes during the induction process, followed with ongoing pastoral support and discussions during our RSHE curriculum

- Children will be made to feel safe in submitting any concerns, e.g. reassurances provided following disclosures

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our campus aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of children, staff, volunteers and management committee

- Protect and educate the whole campus community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

- Set clear guidelines for the use of mobile phones for the whole campus community

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

- **Contact** – being subjected to harmful online interaction with other users, such as peer-topeer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate children about online safety as part of our curriculum. For example:

  - The safe use of social media, the internet and technology ○ Keeping personal information private

  - How to recognise unacceptable behaviour online ○ How to report any incidents of cyber-bullying, ensuring children are encouraged to do so, including where they're a witness rather than a victim

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and

responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year

- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them when their child is inducted to the campus, so they know how to raise concerns about online safety

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

  o Staff are allowed to bring their personal phones to campus for their own use, but will limit such use to non-contact time when children are not present

  o Staff will not take pictures or recordings of children on their personal phones or cameras

- Make all children, parents/carers, staff, volunteers and management committee members aware that they are expected to sign an agreement regarding the acceptable use of the internet in campus, use of the campus's ICT systems and use of their mobile and smart technology

- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

- Make sure all staff, children and parents/carers are aware that staff have the power to search children' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the campus's IT systems.

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our campus community

- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly This section summarises our approach to online safety and mobile phone use.

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, children and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Lawnswood Campus recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard children. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose children to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Lawnswood Campus staff will treat any use of AI to access harmful content or bully children in line with this policy and our anti-bullying/positive behaviour for learning policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the campus.

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent. The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Children with special educational needs, disabilities or health issues

We recognise that children with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- Children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children

- The potential for children with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs

- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these children. This includes: children key worker, pastoral team and the SENDCo as well as the support we provide to help children overcome any communication barriers they face.

Any abuse involving children with SEND will require close liaison with the DSL (or deputy) and the SENCO.

We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Examples of mechanisms:
- Suitably qualified professionals (Pastoral Manger and SEND Lead)
- Suitable training
- Referrals to specialist agencies
- Use of communication packages
- Use of signs and symbols
- One to one support for communication
- Appropriate IT aides

11. Children with a social worker

Children may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks

- The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, [see table at front of this policy), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

- Work with virtual campus heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

13. Complaints and concerns about campus safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Managing Safeguarding Allegations Policy).

13.2 Whistle-blowing

Please see separate whistle-blowing policy that covers concerns regarding the way the campus safeguards children – including poor or unsafe practice, or potential failures.

This policy will cover:

- What areas of malpractice or wrongdoing are covered by the procedures

- The options available for reporting a concern, including who to approach within the campus and externally

- How the campus will respond to such concerns

- What protection is available to staff who report another member of staff

14. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing, preferably on CPOMS. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern

- Details of how the concern was followed up and resolved

- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child which is stored electronically on CPOMS..

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. This is set up through permissions on CPOMS.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the campus.

If a child for whom the campus has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within

- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Record Keeping:

At Lawnswood Campus all records of concerns and safeguarding/child protection files are stored separately from the young person's campus file. Any paper records are locked in a secure location and are recorded on to the CPOMS system. If a supply member of staff reports a concern then this is recorded onto a ==yellow== safeguarding concern form and passed to the DSL immediately to record on to CPOMs. If a young person moves from Lawnswood Campus, we will transfer the files (physically/electronically), wherever possible, this will be done in person if not the file will be transferred securely and separately from the young person's main file within 5 days. We will obtain a receipt from the receiving school. If Lawnswood Campus is the last known school the child attends, records will be retained until the child's 25th birthday.

If a young person arrives at Lawnswood Campus with a child protection file, we will ensure key staff such as designated safeguarding leads, designated teacher and SENCOs are aware as required.

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

In addition: Please see our Recruitment and Selection policy and the Managing Safeguarding Allegations Policy

15. Training

15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the campus's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-campus safeguarding approach and wider staff training, and curriculum planning

- Be in line with advice from the 3 safeguarding partners

- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

- Have regard to the Teachers' Standards to support the expectation that all teachers:

  o Manage behaviour effectively to ensure a good and safe environment o

  Have a clear understanding of the needs of all children

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and DDSL's

The DSL and DDSL's will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Management committee

All management committee members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

- Can be assured that safeguarding policies and procedures are effective and support the campus to deliver a robust whole-campus approach to safeguarding

As the chair of management committee may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

15.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the campus will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See Recruitment and Selection Policy of this policy for more information about our safer recruitment procedures.

15.5 Staff who have contact with children and families

All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

16. Monitoring arrangements

This policy will be reviewed annually, or in the event of a change of key staff, by The Headteachers and the Management Committee lead for Safeguarding. This review will be in line with our local safeguarding procedures, the expectations of the Department for Education and Ofsted which inspects our Centre's safeguarding arrangements.

At every review, it will be approved by the full Management Committee.

17. Links with other policies

This policy relates to safeguarding and child protection concerns and sits within a suite of other safeguarding policies. Our policy applies to all staff (teaching and non-teaching), Management Committee members and volunteers, temporary and supply staff working in our campus.

Other policies that may be referred to within this policy include:

Attendance and Punctuality

Admissions

Anti-bullying

Educational Visits

Visiting Speakers .

Code of Conduct

Safer Recruitment

Positive Behaviour for learning Policy

Positive Relationships Policy

Equal Opportunity

Diversity

Management of Allegations

PSHE

Citizenship

E-Safety

Children Missing Education

Whistleblowing

RSHE

Sexting

British Values

Physical Intervention/Positive Handling

Safer recruitment

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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

- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

- 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

- Seeing or hearing the ill-treatment of another

- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- 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.

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) Ensure

access to appropriate medical care or treatment

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

Recruitment and Selection Policy: see separate policy
Managing allegations against staff – see separate policy

This appendix is based on the advice in Keeping Children Safe in Education, annex B but reflects our context and locally agreed procedures put in place by the 3 safeguarding partners.

Children who are absent from education

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

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

- Are at risk of harm or neglect

- Are at risk of forced marriage or FGM

- Come from Gypsy, Roma, or Traveller families

- Come from the families of service personnel

- Go missing or run away from home or care

- Are supervised by the youth justice system

- Cease to attend a campus

- Come from new migrant families

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

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

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

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

Appearing with unexplained gifts or new possessions

Associating with other young people involved in exploitation

Suffering from changes in emotional wellbeing

Misusing drugs and alcohol

Going missing for periods of time or regularly coming home late

Regularly missing campus or education Not

taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of campus. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our campus has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our campus's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Secondary campuss add: Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in campus (usually the designated safeguarding lead) before the child or children arrive at campus the following day. This is the procedure where police forces are part of Operation Encompass – if your local force is not, check your local procedures and adapt if necessary.

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL [and deputy/deputies] will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place

- A mother/family member disclosing that FGM has been carried out

- A family/pupil already being known to social services in relation to other safeguarding issues .

    A girl:

    - Having difficulty walking, sitting or standing, or looking uncomfortable

    - Finding it hard to sit still for long periods of time (where this was not a problem previously)

    - Spending longer than normal in the bathroom or toilet due to difficulties urinating

    - Having frequent urinary, menstrual or stomach problems

    - Avoiding physical exercise or missing PE

    - Being repeatedly absent from campus, or absent for a prolonged period

    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

    - Being reluctant to undergo any medical examinations

    - Asking for help, but not being explicit about the problem

    - Talking about pain or discomfort between her legs Potential signs that a pupil may be

        at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

- FGM being known to be practised in the girl's community or country of origin

- A parent or family member expressing concern that FGM may be carried out

- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues . A girl:

    - Having a mother, older sibling or cousin who has undergone FGM

    - Having limited level of integration within UK society

    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period

- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)

- Being unexpectedly absent from campus

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place

- Activate the local safeguarding procedures and refer the case to the local authority's designated officer

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

- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or campus counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces **Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;

- Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

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

Campuss have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our campus being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our children to stay safe online at campus and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in children' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

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

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the campus's measures to prevent radicalisation are set out in other campus policies and procedures, including [list any relevant policies here – for example, you may cover this in your curriculum policy, behaviour policy, online/e-safety policy, and/or others].

Sexual violence and sexual harassment between children in campuss Sexual

violence and sexual harassment can occur:

Between 2 children of any age and sex

Through a group of children sexually assaulting or sexually harassing a single child or group of children

Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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 setting

If a victim reports an incident, it is essential that staff make sure they 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them

Regularly review decisions and actions, and update policies with lessons learnt

Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

Consider if there are wider cultural issues within the campus that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again

Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

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

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our campus's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

  Increased absence from campus

  Change in friendships or relationships with older individuals or groups

  Significant decline in performance

  Signs of self-harm or a significant change in wellbeing

  Signs of assault or unexplained injuries

  Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

  Being male

  Having been frequently absent or permanently excluded from campus

  Having experienced child maltreatment

  Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the campus who are visiting for a professional purpose, such as educational psychologists and campus improvement officers, will be asked to show photo ID and:

  . Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

  . The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the campus any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using campus facilities is not seeking to disseminate extremist views or radicalise children or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Contacting parents/carers immediately, DSL/DDSL will look after the child and the incident will be recorded on CPOMS and referred into Wolverhampton Safeguarding hub.

Missing children

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Contacting parents/carers immediately, DSL/DDSL will call/refer into Wolverhampton Safeguarding hub – missing in education team and the incident will be recorded on CPOMS.