

**Outcomes
First
Group.**

**ACORN EDUCATION
AND CARE**

OptionsAutism

School Safeguarding Policy



Underley Garden

**DESIGNATED SAFEGUARDING LEAD:
Jessica Wilson**

**SAFEGUARDING GOVERNOR:
Ann Henderson**

Safeguarding Policy

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1.0 Policy statement

Outcomes First Group is committed to ensuring that all of the people we support are effectively safeguarded in all services including fostering, schools and residential homes at all times. This policy applies to all children and young people receiving education in our settings. It applies when working online and offline, in settings and in all virtual communications.

Safeguarding and child protection must always be the highest priority and at the forefront of everything we do. A whole school approach is required to ensure safeguarding and child protection are embedded in all decisions, planning, policy and day-to-day operations and activities.

It is essential that everybody working within the Outcomes First Group understands their safeguarding responsibilities. Governing bodies and proprietors of schools must ensure that staff who work directly with children read and understand Part 1 of [Keeping Children Safe in Education \(KCISE\) 2022](#). Staff who do not work directly with children can read and understand either Part one or Annex A if it is more effective to enable them to safeguard and promote the welfare of children.

All staff and volunteers working directly or indirectly with children and young people for Outcomes First Group **must** ensure that:

- children and young people feel safe and that they are listened to;
- they create an environment and culture in which children and young people feel valued;
- the best interests of the child are always considered and acted upon;
- safer recruitment procedures are rigorously followed (please refer to the Outcomes First Group Safer Recruitment Policy for further details);
- they understand their roles and responsibilities in keeping children and young people safe through ongoing learning, development and supervision;
- they are vigilant in monitoring possible signs of abuse, including for those children and young people who have complex learning difficulties or specific communication needs, who may be particularly vulnerable;
- they are aware that children can abuse other children (i.e. child-on-child abuse).
- they maintain an attitude of '**it could happen here**';
- they follow the appropriate procedures in place for sharing safeguarding concerns, including low-level concerns, and that these are shared with relevant professionals in a timely manner;
- they understand and implement local safeguarding procedures as set out in local authority arrangements;
- children and young people have opportunity to learn about appropriate relationships with adults and other children and recognise unacceptable behaviour by adults and other children.
- there is a zero-tolerance approach to harassment, violence, abuse, inappropriate behaviour and bullying of any kind are not acceptable and will not be tolerated.

2.0 What is safeguarding and child protection?

2.1 Safeguarding

Safeguarding relates to the action taken to promote the welfare of children and young people to protect them from harm. This policy includes the safeguarding of young adult learners within Outcomes First Group schools and other settings and applies both offline and online.

Safeguarding is defined in [Working Together to Safeguard Children](#) (DfE, Sept 2018, updated July 2022) as:

- Protecting children from maltreatment;
- Preventing impairment of children's health and development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

2.2 Contextual Safeguarding

Outcomes First Group adopts a contextual safeguarding approach to safeguarding and child protection. Contextual safeguarding is: *'...an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.'* (Dr Carlene Firmin)

2.3 Child Protection

Child protection is an important aspect of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

2.4 Safeguarding is everyone's responsibility

While local authorities and placing authorities have statutory responsibilities regarding safeguarding, Outcomes First Group believes that safeguarding is everyone's responsibility. The Group expects that staff keep the child or young person at the centre of all that they do and that any actions taken are in the best interests of the child. We also expect that children and young people are listened to and their voices are always heard. This is without exception and regardless of whether the child or young person is being cared for in a residential setting, foster home or being educated within school or remotely.

2.5 Defining Significant Harm/Child Abuse

2.5.1 The [Children Act 1989](#) introduced the concept of 'Significant Harm' as the threshold that justifies compulsory intervention in family life in the best interests of children. Under [Section 47](#) of the Act, local authorities have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or is likely to suffer Significant Harm.

2.5.2 Under [Section 31](#) of the Children Act as amended by [Adoption and Children Act 2002](#):
'harm' means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another;
'health' means physical or mental health; and
'ill-treatment' includes Sexual Abuse and forms of ill-treatment which are not physical. Abuse or neglect is not always easy to identify; staff are more than likely to have some information but not the whole picture.

2.5.3 There are four defined categories of child abuse, which are deemed to be forms of 'Significant Harm':

- Neglect
- Physical Abuse
- Emotional Abuse
- Sexual Abuse.

2.5.4 It is also important to be aware that:

- technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and harm online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.
- children can abuse other children (child-on-child abuse), this can happen both inside and outside of school and online.

2.5.5 'Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including: sexual, physical and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should put the needs of children first when determining what action to take' ([Working Together to Safeguard Children](#) July 2018, updated July 2022)

Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. ([KCSIE 2022](#))

All staff must be aware of the signs and indicators of child abuse (Please see 7.6 for further information)

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

3.0 Local Arrangements for the school

- 3.1** All staff must be aware of the local arrangements for safeguarding relevant to the school in which they work;
- 3.2** The local arrangements for Underley Garden are as follows ; In the event any member of staff has any concern they must immediately report this verbally to.
Safeguarding Lead – Jessica Wilson , or , Deputy DSL – Nicola Harper
- 3.3** Underley Garden safeguarding arrangements are in line with local safeguarding partnership arrangements. The Cumbria safeguarding children partnership(CSCP)safeguarding partnership consists of the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police force in the local authority area)
- 3.4** The Local Authority Designated Officer or equivalent is Becky Wardlow, Paul Cooper and Laura Cross lado@cumbria.gov.uk or tele no 01768 812267 or through the First Response Team on 0333240 1727.
- 3.5** All safeguarding referrals must be reported to the local authority details are on www.cumbrialscb.com. Or call 0333 240 1727. Referrals for children and young people under 18 will be dealt with under the Children's safeguarding arrangements, whereas those 18 and above will be dealt with under the Adult safeguarding arrangements.
- 3.6** The local authority safeguarding referral procedure;
If a member of staff has serious concerns or that a child is at significant risk of harm they must immediately inform the lead DSL Jessica Wilson or in their absence the Deputy DSL Nicola Harper, or inform Cumbria CSCP (0333 2401727).

For a referral where you have a serious concern, where the young person needs immediate protection contact the First Response **(0333 240 1727)**. The phone call will be followed up with written confirmation within 48 hours. The multi-agency form is available from the MASH website (procedure 3B): **(0333 240 1727)** Where immediate protection is not required you will need to complete a single contact form, which can be found on Cumbria CSCP website Our procedure at Underley Garden following any serious safeguarding concern or allegation is as follows:-

Hold an emergency meeting with DSLs Principal, Registered Manager and NFA safeguarding lead to determine appropriate actions.

Ensure all the necessary contacts are made by the DSL

- Emergency duty team contact for both home and placing LA.
- Single Contact form completed to LSCB hub
- LADO contacted where appropriate
- OFSTED notification (or initial phone call to lead inspector for advice).
- Social worker
- Parents

- 3.7** For all referrals regarding radicalisation prevent@cumbria.police.uk or the confidential Anti Terrorist hotline on 0800 789 321
- 3.8** For all referrals regarding Follow local procedures and Contact Cumbria CSCP as a Multidisciplinary process on 0333 240 1727
- 3.9** The local authority procedure for an early help referral is *see Appendix 1 for flow chart*
- 3.10** The Chair of Governors for Underley Garden is: Ann Henderson 07917902680
- 3.11** The Outcomes First Group Head of Safeguarding/Safeguarding Adviser can be contacted at: safeguarding@ofgl.co.uk

4.0 The role of governors, the proprietor and senior managers

- 4.1** Governing bodies and proprietors have a strategic leadership responsibility for their school's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to [KCSIE \(2022\)](#), ensuring policies, procedures and training in their schools are effective and comply with the law at all times. They must have oversight of the safeguarding policies and procedures and ensure that they are being effectively implemented within the school and that training is effective.

Like teaching staff and volunteers, senior managers and Governors must be safely recruited and have all relevant checks on file. Please see the Group's Safer Recruitment Policy for further information.

4.2 Governing bodies and proprietors should:

- Have a senior board level (or equivalent) lead to take **leadership** responsibility for their schools safeguarding arrangements'. The named Governor for the school is Ann Henderson
- Ensure that the school contributes to multi-agency working in line with [Working Together to Safeguard Children](#) (2018, updated July 2022).
- Be aware of the local multi-agency safeguarding arrangements.
- Receive appropriate safeguarding and child protection (including online safety) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in the school are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- As part of the whole school safeguarding approach, they must create a culture that safeguards and promotes the welfare of children in their school. This includes ensuring that robust recruitment procedures are in place that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools.
- Be responsible for ensuring an appropriate senior member of staff, from the school leadership team, is appointed to the role of **designated safeguarding lead (DSL)**. With the support of governors, proprietors and senior leaders, the DSL should take lead responsibility for safeguarding and child protection, including online safety. This should be explicit in the role-holder's job description.

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- Be aware of their obligations under the [Human Rights Act 1998 \(HRA\)](#) and the [Equality Act 2010](#), which require schools to:
 - Act in a way that respects and protects an individual's human rights when they make individual decisions about them. In particular, the right to: education, freedom from inhuman and degrading treatment, and respect for private and family life. These rights must be protected and applied without discrimination.
 - Carefully consider how pupils are supported with regard to particular protected characteristics, including disability, sex, sexual orientation, gender reassignment and race. Proportionate positive action can be taken to deal with particular disadvantages affecting pupils with a protected characteristic to meet their specific need. This includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions.
 - Guidance to help schools understand how to fulfil their duties under the Equality Act (2010) is available on the DFE website: [Advice for schools](#)
- Ensure that children are taught about how to keep themselves and others safe, including online. This education should be tailored to the specific needs and vulnerabilities of individual children.
- Do all that they reasonably can to limit children's exposure to online risks from the school's system, including:
 - ensuring the school has appropriate filters and monitoring systems in place and regularly review their effectiveness.
 - ensuring that the school leadership team and relevant staff have an awareness and understanding of the appropriate online filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
 - ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
 - consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

4.3 Where there is a safeguarding concern, governing bodies, proprietors and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. This has to be balanced with their duty to protect the victim and other children.

4.4 Where the school premises are used for non-school activities and the services or activities are provided under the direct supervision or management of the school staff, the schools arrangements for child protection and safeguarding apply. Where service or activities are provided by another body, the School must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and ensure they will liaise with the school on these matters as appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The governing body or proprietor should also ensure safeguarding requirements are included in any lease or hire agreement, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

5.0 Designated Safeguarding Lead (DSL)

5.1 With the support of the governing body and proprietor, the Head Teacher must appoint one individual to be the lead DSL and make arrangements for there to be deputy DSL who will manage any immediate safeguarding incidents in the DSL's absence. The DSL must be an appropriate senior member of the leadership team and, along with deputies, will receive DSL training every two years.

- 5.2** The Head Teacher must ensure that job descriptions for DSL and Deputy DSLs are kept on personnel files and clearly state their responsibilities.
- 5.3** The DSL (or deputy) must always be available during school hours for staff to discuss any concerns.
- 5.4 The main responsibilities of the Designated Safeguarding Lead (DSL) are to:**
- provide support to staff regarding safeguarding concerns;
 - lead on advising staff of any action to be taken due to a safeguarding concern;
 - ensure that children and young people are immediately safeguarded from harm and abuse;
 - ensure that there is appropriate cover during their absence, and that staff know who to approach if the DSL is unavailable;
 - liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries;
 - adopt a child-focused and holistic approach ensuring the child's wishes and feelings are taken into account when determining what action to take
 - refer allegations to the Local Authority Designated Officer or equivalent;
 - refer safeguarding concerns to placing and host local authorities;
 - refer suspected cases of radicalisation to Channel;
 - refer suspected case of Female Genital Mutilation to the police;
 - refer suspected cases of Child Sexual Exploitation and trafficking to the police;
 - refer cases to the Disclosure and Barring Service after staff have been dismissed or there is suspected harm having been caused to children and young people;
 - liaise with Outcomes First Group's Safeguarding Team and HR Team if any allegations or suspected harm having been caused to a child by an employee, supply staff or volunteer for Outcomes First group;
 - ensure that the school complies with the work of the local safeguarding partnership.
 - ensure that all staff receive regular update training in relation to safeguarding;
 - provide safeguarding updates to senior managers and school governors;
 - keep the headteacher/principal informed of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult (See [PACE Code C 2019](#) and DFE Guidance, [Searching, Screening and Confiscation](#) for further information)
 - ensure that there is effective monitoring and oversight of all safeguarding concerns;
 - promote the educational achievements of Looked After Children in line with the [Children and Social Work Act 2017](#)
 - have details of the social worker for any looked after children and the name of the virtual school head in the relevant authority for any children with a social worker or previously looked after.
 - have a thorough knowledge and understanding of KCISE 2022.
- 5.5** It is important that all staff understand the role of the DSL on their appointment within the school and as part of their induction. The DSL is responsible for ensuring that all staff understand their roles and responsibilities regarding safeguarding children and that a child focused approach is taken. The DSL will assess safeguarding concerns within the context of young people's environments. This is known as contextual safeguarding.
- 5.6** The DSL must ensure that clear, concise and good quality documents are kept of all allegations

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or safeguarding concerns, including low level concerns. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should 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.
- reports about incidents of sexual violence should include the time and location, so action can be taken to make the location safer if required.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

5.7 Data protection and GDPR are not barriers to record keeping or information sharing when promoting children's welfare. Schools have clear powers to share, hold and use information for these purposes. The school should have clear arrangements in place for the processes and principles for sharing information within the setting and other Outcomes First Group Divisions and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required. Staff are required to be proactive in sharing information as soon as possible when it is in relation to a child's safety or wellbeing.

5.8 When young people move schools or move into further or higher education, the DSL is responsible for ensuring that the necessary information is shared with the new school.

It is the DSL's responsibility to ensure that a pupil's child protection file is transferred to the new school as quickly as possible and as securely as possible. This should be within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school to have support in place for when the child arrives. **Files must be transferred securely;** the child protection file should be transferred separately from the main pupil file. Confirmation of receipt must be obtained. Schools must inform their Local Authority of all deletions from their admission register when a child is taken off roll.

5.9 Consideration must be given to sharing information verbally with the new school prior to the child or young person leaving. The DSL must ensure that confidentiality of any third parties is not breached and that they comply with GDPR. Records must contain factual information and must not be speculative. These documents must be kept confidential with the exception of sharing them with relevant professionals as part of safeguarding and protecting the child or young person. Records must be updated, and any actions must be followed up and completed. It is the responsibility of the DSL to ensure that a safe and satisfactory outcome has been reached and that all actions have been completed.

6.0 Safeguarding Training and Updates for all staff

6.1 Governing bodies and proprietors should ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety, and the requirement to ensure children are taught about safeguarding, that safeguarding training for staff is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. They must regularly review the training programme to ensure that it includes all the required knowledge and that staff understand how it is to be implemented.

Whilst considering the above training requirements, governing bodies and proprietors should have regard to the [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires

teachers to have a clear understanding of the needs of all pupils.

- 6.2** This policy **must** be read in conjunction with [KCSIE 2022](#), which must be followed.
All staff are expected to follow this policy and statutory guidance.

6.3 All staff must read the following documents:

- Part 1 (or Annex A where appropriate) of [KCSIE 2022](#)
- The school's:
 - Restrictive Physical Intervention Policy (promoting good behaviour and discipline policy)
 - Behaviour Policy (promoting good behaviour and discipline policy)
 - Anti-bullying policy
 - Low level concerns Guidance & Procedure
 - Peer-on-peer abuse policy (includes Harmful Sexual Behaviour Guidance)
 - Exploitation policy
 - Protecting Children from Radicalisation policy
 - Web Filtering policy
 - Medication Policy
 - Description and guidance of the role of the DSL and the role of the Deputy DSL

Outcomes First Group's:

- The Use of Restrictive Practices and Restraint Terms of Reference
- Safer Recruitment policy
- Data Protection policy
- Staying Safe Online
- Gaming Devices Best Practice Guidance
- Whistle blowing and complaints policy
- Code of Conduct & Ethics Policy

Staff should also be aware of the following DFE Guidance:

- [Working Together to Safeguard Children](#)
- [Sexual violence and harassment between children in schools and colleges](#)
- [Children Missing in Education](#)
- [Promoting the Education of Looked After Children](#)
- [Teaching Online Safety in Schools](#)
- [Sharing nudes and semi-nudes advice for education settings working with children and young people](#)
- [Searching, Screening and Confiscation](#)
- [Harmful Online Challenges and Online Hoaxes](#)
- [Preventing and tackling bullying](#)
- [Mental health and wellbeing support in schools and colleges](#)

[Supporting practice in tackling child sexual abuse](#) - CSA Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

- 6.4** Safeguarding updates must be regularly provided to staff, either through face-to-face training, meetings or through regular written updates.
- Face to face safeguarding training must be provided (and recorded) to **all staff at least annually.**

- **DSL** must refresh their advanced training **at least every two years**.

6.5 All members of school leadership teams, including the Head Teacher and DSL should also be familiar with [Working Together to Safeguard Children](#)

7.0 Roles and Responsibilities of Staff

7.1 Outcomes First Group recognises that it is not just one person's role to safeguard children, it requires a collective approach to safeguarding. All employees must understand their roles and responsibilities regarding keeping children safe and reporting concerns.

7.2 During staff induction, staff will receive safeguarding training, including online safety. Staff must be familiar and understand the role of the DSL, the local safeguarding partnership and the individual systems relating to safeguarding within the school. Staff must also know, understand and implement the school's behaviour management policy, the child protection policy, the school's code of conduct, the safeguarding response to children who go missing from education and Keeping Children Safe in Education 2022, Part 1.

7.3 Staff are responsible for:

- compliance with Outcomes First Group policies, statutory guidance and legislation including [KCSIE 2022](#) and [Working Together to Safeguard Children](#)
- understanding the role of the DSL;
- helping to develop and deliver a curriculum which helps children and young people to understand about abuse, appropriate and safe relationships with adults and other children, and keeping safe both online and offline;
- helping to provide an environment where children and young people feel safe and valued;
- attending training and meetings;
- ensuring that they fully understand how to report concerns and if not, asking for further training and support;
- understand the safeguarding response to children who go missing from education;
- listening to children and young people;
- supporting children and young people if they disclose safeguarding information;
- ensuring that they are alert to signs of abuse by other children or adults;
- ensuring that they are aware of indicators or possible signs of neglect;
- ensuring that they closely monitor any possible signs of abuse or harm for those children who are unable to communicate verbally or who have complex health and care needs;
- keeping sensitive information confidential and sharing it only with those professionals for whom it is relevant;
- helping to identify those children or young people who may benefit from Early Help;
- helping to implement Child Protection Plans.

7.4 Staff are in a close position to children and young people within schools as they know the children and young people. They have regular contact with them and so are in the best position to know if a child or young person is behaving in a way which could possibly indicate that they are being hurt or harmed. Any concerns, whether these are nagging doubts, worries, concerns or based on information told to them, must be reported immediately to the DSL both verbally and in writing. **It is the staff member's responsibility to ensure that this information is acted upon. They have a duty to follow up with the DSL to ensure that action has been taken.**

7.5 All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. Staff must maintain professional curiosity and be alert to changes in children's behaviour. Staff

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must speak to the DSL if they have any concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people to facilitate communication.

- 7.6** Some common signs staff should be alert to that may indicate something concerning may be happening in a child's life include:
- unexplained changes in behaviour or personality
 - becoming withdrawn
 - seeming anxious
 - becoming uncharacteristically aggressive
 - lacks social skills and has few friends if any
 - poor bond or relationship with a parent
 - knowledge of adult issues inappropriate for their age
 - running away or going missing
 - always choosing to wear clothes which cover their body.

These signs do not necessarily mean that a child is being abused, there could be other things happening in their life which are affecting their behaviour. Staff should discuss any concerns with the DSL .

- 7.7** A child or young person being Lesbian, gay, bisexual or transgender (LGBT) is not in itself an inherent risk factor for harm. However, children who are LGBT, or are perceived to be LGBT, can be targeted by other children. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

- 7.8** Looked after children and previously looked after child can potentially remain vulnerable and all staff should have the skills, knowledge and understanding to keep looked after children and previously looked after children safe. It is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

- 7.9** Staff should be aware that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships as teenagers. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

The Headteacher/Principal and DSL should be familiar with [Operation Encompass](#) which enables schools and police to work together to provide emotional and practical help to children, where police have been called to an incident of domestic abuse in the household.

- 7.10** The School must ensure that pupils know:
- how to report any concerns and feel confident that they will be listened to and supported.
 - They can also report any concerns by emailing tellus@ofgl.co.uk, which is monitored by the Outcomes First Group's Quality Team.
 - Are aware of the NSPCC dedicated helpline 0800 136 663
 - Are aware of how to contact Childline

8.0 Safer Recruitment

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- 8.1** The Outcomes First Group's Safer Recruitment Policy sets the processes which must be followed for the recruitment of staff and volunteers, which includes the requirement for enhanced DBS and other checks.
- 8.2** It is the responsibility of the Head Teacher to ensure that the Single Central Record is compliant with legislation and statutory guidance and kept up to date and is stored confidentially.
- 9.0 Early Help**
- 9.1** *'A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989' (KCSIE 2022)*
- 9.2** It is important that staff take swift and effective action to safeguard children and young people and to stop concerns from escalating. It may be that some children and young people will benefit from Early Help. All staff should be aware of their local early help process and understand their role in it.
- 9.3** Staff must be aware and alert to the possibility of Early Help being needed for those children and young people who have particular vulnerabilities, such as those who:
- is disabled or has certain health conditions and has specific additional needs;
 - has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
 - has a mental health need;
 - is a young carer;
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
 - is frequently missing/goes missing from care or from home;
 - is at risk of modern slavery, trafficking, sexual or criminal exploitation;
 - is at risk of being radicalised or exploited;
 - has a family member in prison, or is affected by parental offending;
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
 - is misusing drugs or alcohol themselves;
 - has returned home to their family from care;
 - is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
 - is a privately fostered child;
 - is persistently absent from education, including persistent absences for part of the school day.
- 9.5** Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm
- 9.6** When a child or young person has been referred for Early Help, it is the responsibility of the DSL to set 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 professional. Any such cases should be kept under constant review and consideration must be

given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

10.0 Reporting concerns

10.1 What to do if a child or young person discloses

Systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

If a child or young person discloses information to a member of staff, they must ensure that they:

- listen to the child or young person and reassure them they are being taken seriously and that they will be supported and kept safe.
- never give them the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. They must never be made to feel ashamed for making a report.
- do not dismiss what the child or young person tells them. All concerns must be acted upon rigorously;
- do not promise to keep it a secret. The member of staff must explain that they have a duty to share information to keep them safe and protect them;
- write down what the child or young person tells them. This must be accurate and in the child's words;
- immediately report the concerns to the DSL or deputy. If neither is available, the member of staff must report the information to the Head Teacher, Principal or Regional Director.

10.2 Staff must be alert to not just potential familial abuse and allegations, but also to children and young people making allegations against staff, volunteers or other children. In these situations the Group's Managing Allegation Procedures must be followed. (See Section 24 for further details).

10.3 All concerns, however small or trivial they may seem, **must** be immediately reported to the DSL. This must be done verbally and then followed up **on the same day** and documented on the electronic recording system. The member of staff has a responsibility to ensure that action has been taken with regards to the concerns on the **following day** and that the concern is documented on the electronic system. If action is not taken in a timely way as the member of staff sees fit, they have a duty to escalate their concerns to the Head Teacher or the Regional Director.

10.4 Staff must prioritise the child or young person's immediate safety. They must remain professional and adhere to all safeguarding and confidentiality procedures. After sharing the information with the DSL or deputy, they must not share it with anyone else.

10.5 On receipt of the information, the DSL must consider all information and then, in cases of serious concern, report this within **one working day** to the host authority, placing authority, Regional Director, and where relevant, the Local Authority Designated Officer or equivalent.

11.0 Managing Referrals to Disclosure and Barring Service (DBS)/ Disclosure Scotland and professional bodies

11.1 As a result of an allegation or investigation a referral may be required. This can include referrals to Disclosure and Barring Service, Disclosure Scotland, Social Work England, the Scottish Social

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Services Council (SSSC) and other professional bodies, including the Care Council for Wales (CCW), and/or Northern Ireland Social Care Council (NISCC) or Teacher Regulation Authority/ General Teaching Council for Scotland (GTCS).

- 11.2** The Headteacher/Principal of the setting is responsible for making the referral at the appropriate time. The timing of the referral can vary by nation and by the severity of the concern. The Head of Service/Principal must be familiar with, and follow, the national requirements and make the referral at the appropriate time.
- 11.3** If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to the appropriate body must be made.
- 11.4 It is an offence in all UK nations not to make a referral to the appropriate disclosure body.**
- 11.5** If a referral is made, at the point of completion the Headteacher/Principal must notify safeagurding@ofgl.co.uk and the Human Resources Advisor hropertationsadvice@ofgl.co.uk of the referral and any other possible referrals to any relevant professional body in the United Kingdom, relating to the allegation made.
- 11.6** If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to DBS/ Disclosure Scotland must be made.
- 11.7** Where a teacher is dismissed or their services are no longer used because of serious misconduct or might have been dismissed or services ceased to be used had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

12.0 Partnership working and sharing information

- 12.1** Partnership working and the sharing of information is key in keeping children safe. Everyone who has a role to play in caring for children has a duty to share good quality information with the relevant professionals in a timely manner.

12.2 General Data Protection Regulations

All schools must ensure that they comply with the Outcomes First Group's Data Protection policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to children and young people's personal information, as well as that of staff and parents/carers.

GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on. It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required.

Information can be shared without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It is legitimate to share information without consent where:

- it is not possible to gain consent;
- the school cannot reasonably be expected to gain consent; and
- if to gain consent would place a child or adult at risk.

Where there is any doubt, the DSL should contact the Outcomes First Group's Legal Team for clarification.

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All staff must complete the GDPR training. All staff have a responsibility to ensure that they comply with the GDPR requirements.

- 12.3** Schools must ensure that they inform pupils, parents and carers of how their personal information will be stored and used.
- 12.4** Schools must ensure that they hold emergency contact details of the parents/carers of pupils. This is to be done with the agreement of the parents/carers. In line with KCSIE (2022) schools must hold more than one set of contact details for each pupil, where reasonably possible.
- 12.5** Data breaches must be reported immediately to the Data Protection manager as set out in the Data Protection Policy.

13.0 Child-on-child abuse (also known as peer-on-peer abuse)

- 13.1** The term peer-on-peer abuse is mainly replaced by the term child-on-child abuse in Part 5 of KCSIE (2022), this is to indicate that children of differing ages, as well as similar ages, can abuse one another.

Local Safeguarding procedures must be followed, and any incidents of sexual violence will be reported to the police. Schools should be part of discussion with statutory safeguarding partners.

- 13.2** It is essential that all staff understand that abuse is abuse and the importance of challenging inappropriate behaviours between children. In addition to the information below, staff should familiarise themselves with the Outcomes First Group's **Child-on-Child Abuse Policy**.

KCSIE (2022) states: **"Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it."**

- 13.3** Staff must ensure that they create a school environment where children and young people's safety is paramount and where unacceptable or unsafe behaviour is not tolerated. Staff must be aware and alert to incidents of online abuse between children, consensual and non-consensual sharing of nude and semi-nude images, sexual violence and sexual harassment between pupils and bullying. This includes upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause the victim humiliation, distress or alarm. Staff must be alert to possible signs of child-on-child abuse. Inappropriate language must be rigorously and consistently challenged.
- 13.4** All staff should understand, that even if there are no reports in their schools, it does not mean it is not happening, it may be the case that it is just not being reported. Staff are advised to maintain an attitude of **'it could happen here'** and be vigilant to any signs.
- 13.5** It is important that staff are aware that children may not find it easy to tell an adult about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

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- 13.6** It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.
- 13.7** Staff should explain to children and young people in an appropriate way that the law is in place to protect them rather than to criminalise them. This should be explained in a way that avoids alarming or distressing them.
- 13.8 Staff must act immediately and report any concerns regarding child-on-child abuse to the DSL.**
- 13.9** Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - abuse in intimate personal relationships between peers;
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence, such as rape, assault by penetration and sexual assault
 - sexual harassment, e.g. 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,
 - consensual and non-consensual sharing of nude and semi-nude images and or videos
 - upskirting
 - 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)
- These forms of abuse can happen inside or outside of school both offline and online.
- 13.10** A contextual safeguarding approach must be taken when considering possible child-on-child abuse. Children and young people who display harmful behaviours must be seen as potential victims themselves, and the wider environmental risks must be taken into account. Staff must challenge any gender bias or derogatory language used by staff or pupils. Staff must not dismiss any concerns brought to them by pupils. Staff can report concerns verbally, but they must ensure that all concerns are recorded onto the schools electronic recording system by the end of the school day.
- 13.11** It is also important to understand intra familial harms and any necessary support for siblings following incidents, this applies whether siblings attend the same or a different school.
- 13.12** When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour. Schools must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.
- 13.13** DSL must deal with any concerns of child-on-child abuse immediately and sensitively. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.

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13.14 The language used must be sensitive, non-judgemental and must not blame the victim. Victims must be supported and reassured that their safety and welfare within the school is the priority. Risk assessments must be implemented where necessary.

13.15 Where the DSL believes that there has been significant harm caused to the pupil, a referral must be made to the local authority immediately. In agreement with the local authority, parents/carers must be informed. Where possible, as best practice, parents/carers are to be informed face to face.

If the local authority does not believe it meets their threshold for further action and the DSL is not in agreement, this must be challenged with the local authority.

13.16 After the outcome/conclusion of the incident:

- a contextual safeguarding approach must be taken;
- schools must take all necessary action to learn from the incident and prevent future incidents from occurring, such as through targeted education around specific types of child-on-child abuse;
- support for the victim must be offered and provided where possible. Appropriate risk assessments must be implemented to provide reassurance and safety for the victim;
- schools must ensure that they **do not** adopt a victim blaming approach;
- the DSL must complete an investigation into the incident; The investigation must consider the incident itself as well as whether it is an isolated incident, and the personal circumstances of the young person who is alleged to have displayed harmful behaviour;
- if necessary, appropriate referrals must be made to support services for the young person who has displayed harmful behaviours;
- a risk assessment must be completed and implemented for the young person who has displayed harmful behaviours in order to safeguard them and other pupils.

14.0 Bullying

14.1 Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children should have adequate policies, procedures and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable'.

14.2 Outcomes First Group has a zero-tolerance approach to bullying. All staff have a responsibility to challenge all bullying. Staff must help children and young people to understand what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Staff must report any bullying concerns to the DSL **on the same day**. The concerns must be documented appropriately.

14.3 Schools have a responsibility to ensure that those children and young people who bully, are supported and helped to understand the impact of their actions.

14.4 The government has produced the following guidance on preventing and tackling bullying, mental health and behaviour in school:

[Preventing and tackling bullying](#)

[Mental health and behaviour in schools](#)

See [Rise Above](#) for links to materials and lesson plans

14.5 For further information please refer to the school's anti-bullying policy, child protection policy, the Web Filtering policy, and Part five: Child on child sexual violence and sexual harassment of KCSIE 2022.

14.6 All staff have a responsibility to report any suspicions or concerns that a child has or may be mistreated or harmed.

15.0 Preventative Strategies

15.1 It is important that children are taught about how to keep themselves and others safe, including online. This preventative education will be effectively tailored to the specific needs and vulnerabilities of individual children.

For pupils who are non-verbal or have limited receptive and expressive communication and learning disabilities, more direct on-going observation is often required to support them and keep them safe, along with the direct modelling of safe behaviour by those responsible for their care and education. The support required must be tailored to the individual child's needs and be included in their Care Plan.

15.2 The school will take all appropriate action to ensure that children and young people learn about appropriate relationships with adults, keeping safe, online safety as well as sex and healthy relationships. Relationship, Health and Sex Education (RSHE) lessons, Relationships Education, and Relationships and Sex Education will focus on important age-appropriate issues in line with Government guidance. Staff must ensure that children and young people have opportunity to learn about safe relationships between peers as well as who they can talk to if they have any concerns.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

A one-stop page providing teachers with support in teaching RSHE topics can be found here: <https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health>

15.3 Children should be supported by staff to understand what abuse is. Children must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse. This should include being able to access in private, relevant websites or help lines such as Childline to seek advice and help.

15.4 The school recognises that some children and young people are more vulnerable by virtue of their complex health or behavioural needs, or disabilities. In these instances, all staff have a responsibility to be the 'eyes and ears' and report all concerns to the DS Lead.

15.5 For further information, refer to Part 5 of Keeping Children Safe in Education (2022) 'Child on Child Sexual Violence and Sexual Harassment'.

16.0 Online Safety

16.1 There is a whole school approach to online safety to help equip pupils with knowledge and understanding to stay safe online. The school helps and supports its pupils to recognise and avoid online safety risks and to help build their digital resilience. This is integrated into everyday learning and covered in detail as part of the RSHE curriculum. There are a range of

resources to provide support for online safety in schools at:
<https://www.childnet.com/teachers-and-professionals>

As highlighted in 15.1, those who are non-verbal or have limited receptive and expressive communication and learning disabilities, will require specifically tailored support which is likely to involve more direct on-going observation to keep them safe. Staff will directly model safe behaviour. The support required must be tailored to the individual child's needs and be included in their Care Plan.

- 16.2** The school will work with parents and carers to help keep children safe online. Parents will be informed about what their children are being asked to do online, including the sites they will be asked to access and if their child is going to be interacting with others online. Information about the systems used to filter and monitor online use can be found in the School Web Filtering Policy.
- 16.3** The Outcomes First Group requires safe and secure systems to be put in place within schools that limits the exposure to such risks. Please see the Group Web Filtering Policy that is updated for schools each year and the Group's Staying Safe Online Policy. The school also has a clear policy on the use of Mobile and Smart Technology.
- 16.4** **If a member of staff has reason to believe that a child or young person is experiencing harm or is at risk of harm, the reporting process set out in this policy in Section 10 must be followed immediately.**
- 16.5** If staff become aware of an online incident that is a cause for concern, they should:
- Provide reassurance to the child or adult.
 - Take immediate action to report any criminal offences to the police and social care.
 - Inform the child or adult's placing authority and family as appropriate.
 - Review the supervision and support arrangements for the child accessing the internet.
 - Check the privacy and security settings on the child's devices and account.
 - Agree what action will be taken to prevent recurrence and reduce risk, the risk assessment should be reviewed and updated. Further online safety learning requirements should be considered for the child.
- 16.6** Digital technology and its related risks are developing rapidly. An annual review of the school's approach to online safety will take place, supported by an annual risk assessment that considers and reflects the risks children face. A free online safety self-review tool for schools can be found at <https://360safe.org.uk/>
- 16.7** The UKCIS external visitors' guidance highlights a range of resources which can support educational settings to further develop a whole school approach towards online safety:
<https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings>
- 16.8** Further helpful resources for online safety:
- UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Harmful Online Challenges and Online Hoaxes](#) this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.
- LGFL [Undressed](#) provides schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders
- National Crime Agency's CEOP education programme: [ThinkuKnow](#)

17.0 Children Missing Education

- 17.1** All staff must be aware of the risks associated with children who go missing from education, and particularly that very often missing incidents are a warning sign of other safeguarding concerns such as exploitation, forced marriage, FGM, substance misuse or mental health problems. The risk of exploitation and abuse increases for those children and young people who go missing from home and school.

Early identification and intervention is a priority. Schools must have appropriate procedures in place for monitoring the attendance of children and young people in school. Attendance must be monitored through Senior Leadership Team Meetings and Governance.

- 17.2** The DSL must contact the main emergency contact as detailed on the pupil's file should there be concerns regarding the pupil missing education.

Staff must report all unauthorised absences to the DSL, who must make contact with the child or young person's parent/carer immediately to establish the child or young person's whereabouts. The DSL must inform the placing authority of a pupil's poor attendance.

- 17.3** The DSL is responsible for investigating any unexplained absences. Reasonable enquiries must be made to locate a child or young person who is missing from education. The DSL **must** refer any safeguarding concerns regarding the absence of a pupil to the local authority. Cases where there are concerns regarding forced marriage or FGM must be referred to the police immediately. All information **must** be documented appropriately.

- 17.4** Children and young people who are repeatedly missing from education are at particular risk of harm. Attempts must be made to talk to the child or young person about why they are missing from education. Records must be kept of those discussions. Any safeguarding information which the child or young person discloses must be shared **immediately** with the local authority. If the child or young person discloses immediate safeguarding concerns, the DSL must share this information with the police.

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

- 18.1** Exploitation of children and young people is a form of child abuse and can include sexual exploitation or criminal exploitation. This occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and /or for financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

- 18.2** CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that both boys and girls can be at risk of criminal exploitation. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

- 18.3** Schools must write and implement a local exploitation procedure which staff must be familiar with. All staff **must** read Outcomes First Group's Exploitation policy as well as refer to KCSIE (2022).

- 18.4** All staff **must** know the definitions, signs and indicators of CSE, CCE and County Lines. DSL must provide ongoing training and learning to staff around exploitation. All staff **must** have training in exploitation.

- 18.5** Staff **must** report any concerns regarding exploitation **immediately** to the DSL and document their concerns appropriately **on the same day**. Where there are immediate concerns relating to children and young people's safety due to exploitation, DSLs must make a same day referral to the local authority and report the concerns to the police as well as to the Regional Director.
- 18.6** It is everyone's responsibility to help children and young people know about grooming and exploitation. Schools must ensure that children and young people know who to talk to if they have any concerns for themselves or other children.

19.0 Serious violence

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

Further guidance for professionals can be found here:

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

[County Lines Toolkit For Professionals](#) includes information on the signs of a child's involvement in county lines, published by the Home Office and The Children's Society.

20.0 'Honour'-based abuse – including FGM (Female Genital Mutilation) and Forced Marriage

- 20.1** Honour based abuse (HBA) can be described as practices which are used to control behaviour within families or other social groups in order to protect perceived cultural and religious beliefs and/or honour. The term 'honour-based abuse and violence' relates to the offender/s interpretation of the motivation for their actions. It is a violation of human rights and for young victims it is a form of child abuse and is a child protection matter.
- 20.2** HBA can affect people of all ages, but often begins early in the family home. Girls and women are particularly at risk; however boys and men are also affected and may be at heightened risk if there are factors around disability, sexuality and mental health. Those subjected to it may find it particularly difficult to seek help as usual avenues seeking help, through parents or other family members may be unavailable.
- 20.3** HBA can take many forms, it can include:
- forced marriage
 - female genital mutilation
 - Breast ironing
 - virginity testing
 - physical, sexual and economic abuse and coercive control

Victims can experience multiple forms of abuse and multiple perpetrators can be involved.

Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK](#)

20.4 If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they must speak to the DSL (or deputy). As appropriate, the DSL (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

20.5 Teachers have a specific legal duty to report concerns regarding Female Genital Mutilation (FGM), (under Section 5B of the Female Genital Mutilation Act 2003, section 74 of the Serious Crime Act 2015): If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. In suspected cases of FGM, staff must refer to the local authority as well as the police. The DSL will assist and support staff with this.

20.6 Staff must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet': <https://www.gov.uk/government/publications/female-genital-mutilation-leaflet>

20.7 The DSL must ensure that immediate concerns regarding potential abuse, harm, honour-based abuse, CSE and Trafficking or Radicalisation are shared **immediately** with the Regional Director and Chair of Governors, and that staff have documented them appropriately.

21.0 Preventing Radicalisation

Staff must also be familiar with the Protecting Children from Radicalisation Policy

21.1 Outcomes First Group fully recognises its responsibility to have arrangements in place to safeguard and protect children from radicalisation. Section 26 of the Counterterrorism and Security Act 2015 places a statutory responsibility on schools to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the 'Prevent' duty.

21.2 All staff must be aware of the signs and indicators of radicalisation. Staff must be proactive in reporting any concerns, regardless of how small they may be, to the DSL who must assist staff to report all concerns regarding radicalisation to the Police as well as the Regional Director. Staff must document their concerns appropriately.

21.3 All staff must be aware of the local procedures relating to reporting radicalisation concerns.

22.0 Children Requiring Support with their Mental Health

22.1 Outcomes First Group recognises that schools have an important role in supporting the health and wellbeing of children and young people. Mental ill-health can be an indicator of a child suffering or at risk of abuse, neglect or exploitation. All schools should have systems in place for identifying mental health problems and referring to appropriate agencies for additional support. This will ordinarily be with the consent of the child and their family. All details of concerns and any referrals or other support arranged for the child should be documented on the schools electronic recording system.

22.2 Schools can refer to the [Mental Health and Behaviour in Schools guidance \(2018\)](#) The guidance provides advice on how to create a whole school culture in promoting positive mental health outcomes for children and young people.

Public Health England provide [Every Mind Matters](#) to help teach RSHE providing simple,

practical advice for a health mind.

23.0 Physical Interventions

All staff must read and know the:

- school's individual Physical Intervention Policy (*Promoting good behaviour and discipline policy*)
- group's [Use of Restrictive Practices and Restraint Terms of Reference](#)

23.1 While every school creates an atmosphere of nurturing, unconditional positive regard and warmth, Outcomes First Group recognises that on occasion it may be necessary to use physical intervention to keep a child or young person safe. Physical intervention must be a last resort and must always be proportionate. Once the child is safe and calm, it is essential that there is a debrief with the child. It should be an open discussion with the member of staff encouraging the child to talk about how they feel and understand what happened.

The intervention and the follow-up action must be recorded on the School's Electronic Recording System.

23.2 If a child or young person makes an allegation after a physical intervention, it is important that the member of staff writes down as much information as possible. Staff must complete body maps immediately after the event and make an appropriate electronic record. Staff must also verbally inform the DSL (or deputy) as well as recording it onto the schools electronic recording system. **Medical attention must always be sought for the young person.** Staff must inform their parents or carers. Allegations of harm relating to physical interventions must be reported to the Regional Director, the Group Head of Safeguarding/Safeguarding Adviser (safeguarding@ofgl.co.uk) and the Local Authority Designated Officer or equivalent officer.

24.0 Allegations against staff

24.1 An allegation is any concern, complaint or disclosure that indicates a member of staff, agency staff, volunteer or contractor has:

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

24.2 All allegations must be treated seriously. Staff must maintain an open mind and suspend all judgement. Allegations must never be dismissed. When managing allegations, it is important that staff maintain a level of professional curiosity. Staff have a responsibility to look after themselves and not to place themselves into situations which could present as unsafe. Staff must report any concerns to the Regional Director and the DSL.

24.3 When a child makes an allegation about a member of staff, the member of staff receiving the complaint must:

- write everything down and document it on the school's electronic recording system.
- immediately report the allegation to the DSL (or deputy).

The DSL must:

- take all allegations seriously regardless of whether a child or young person has made previous allegations;
- report allegations to the Local Authority Designated Officer or equivalent within one working day;
- ensure that they follow the Outcomes First Group's Managing Allegations Against Staff Procedure.

24.4 Part four of Keeping Children Safe in Education (2022) outlines the importance of retaining oversight of any concerns or allegations about agency or supply staff, volunteers or any member of staff employed by a third party working in the school setting. Whilst the individual may not be employed by Outcomes First Group, **schools must ensure** that allegations are managed properly. KCSIE (2022) states *'In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation.'*

24.5 If the allegation is regarding the Headteacher/Principal then the Regional Director must be informed immediately. They will then seek advice from the Local Authority Designated Officer (or equivalent).

24.6 All allegations made against staff must be reported to:

- the Regional Director
- Human Resources (hroperationsadvice@ofgl.co.uk)
- Group Safeguarding Team (safeguarding@ofgl.co.uk)

Outcomes First Group recognises that managing allegations can be challenging and will support with the process. Please refer to the Managing Allegations Procedure for further details.

24.7 It is the responsibility of the DSL to ensure that all allegations are managed in line with local safeguarding partnership procedures.

25.0 Low-level concerns

Please also see the Group's Low level concerns guidance & procedures document

25.1 Staff must be aware of the process for addressing low-level concerns. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is not considered serious enough to consider a referral to the local authority designated officer or equivalent.

Examples may include but are not limited to:

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

25.2 All low-level concerns must be shared with the Headteacher/Principal or DSL. The **DSL must inform the Headteacher/Principal** of all the low-level concerns, in a timely fashion according to the nature of each particular low-level concern. **The Headteacher/Principal is the ultimate**

decision maker in respect of low-level concerns.

If there are concerns about the headteacher/principal these concerns should be referred to a senior member of the Outcomes First Group (such as the Regional Director, Director of Operations, Chief Operating Officer or Chief Executive Officer). If there is a conflict of interest in reporting the matter to any of these internal colleagues, the concern should be reported directly to the local authority designated officer or equivalent officer.

25.3 Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

25.4 Written records must be kept of the concerns in chronological order to establish a full picture of what is happening and if any pupil/s may be at risk. Records should be reviewed regularly so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher/Principal (or Regional Director if the concern is about the Headteacher/Principal) should decide on an appropriate course of action.

26.0 Working with the Local Authority Designated Officer or equivalent officer

In all referrals, the DSL is the lead professional within the school for ensuring that a timely response is received from the local authority. If a response is received which the DSL believes is inappropriate and does not prioritise the child or young person's safety, this must be escalated to the Headteacher or Governors of the school to agree further action.

27.0 Whistleblowing

27.1 Safeguarding is everyone's responsibility. Outcomes First Group recognises that on occasion staff may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns that they may have. The Group also recognises that children will be unable to voice their concerns if they are in an environment where staff also fail to voice their concerns.

27.2 All staff have a duty first and foremost to the children in their school. Any concerns, regardless of how small they may seem, must be reported. DSLs and Head Teachers have a responsibility to ensure that they create an environment where staff feel safe to openly voice any concerns and feel listened to. It is also important that staff feel supported if concerns are raised about them. If staff see or hear about other colleagues' practice which they are concerned about, which potentially may cause emotional or physical harm to a pupil, or if the standard of care being provided falls short of expectations, they must report this.

27.3 Outcomes First Group has an anonymous telephone support system (Safecall) where staff are able to share any concerns that they may have, safely and without fear of reprisal. All whistleblowing concerns will be taken seriously and treated as such.

27.4 Staff can call Safecall on **08009151571**, report online **www.safecall.co.uk/reports**, or email **outcomesfirstgroup@safecall.co.uk**

28.0 Digital and Remote Learning

Where digital learning and remote learning options are provided for children and young people, all staff should be mindful that the **Outcomes First Group's and school's safeguarding policies & procedures and Code of Conduct & Ethics Policy continue to apply at all times when working online or offline at any location.**

School Policy

- 28.1** The Group's Acorn Digital Learning provides online teaching for those who currently find themselves without access to a school setting, or are unable to attend school for medical, mental health, anxiety or behavioural reasons. Acorn Digital Learning have produced a Live Online Risk Assessment, and Student Remote Learning policy and template, which have been shared with all Outcomes First Group schools and can be utilised as required.
- 28.2** Data protection and GDPR considerations must be taken into account. This includes rules on signing pupils up to online services, and staff accessing personal data when working at home. It is recommended that staff are regularly reminded of the data protection and GDPR policies and procedures, whether they are working from school or remotely.
- 28.3** The guidelines for digital learning below must be followed:
- Ensure parents and carers are aware of online safety advice and resources such as [Thinkuknow](#) and [Safer Internet Centre](#)
 - A link to [ParentInfo](#) should be on the school's website – this DfE backed website provides parents with up-to-date information about a range of topics.
 - If staff are concerned about a comment made online by a pupil or the work they share, the staff member should take a screen shot and report it to the DSL via MyConcern / CPOMS (or the school's existing protocol as long as it is secure).
 - Staff and pupils should be fully dressed and take into account the background/ surroundings. Staff should use a communal area, and anything in the background that could cause concern or identify family members/ personal information, should be removed or a sheet used.
 - The teacher may need to give guidance to pupils to remove items from view. If a pupil is inappropriately dressed or in an unsuitable setting (e.g. a bedroom) they must be removed from the video call.
 - Staff must not enter into one-to-one tuition voice or video call with an individual pupil or student without SLT agreement. If there is a need for single pupil interaction, please ensure that a colleague is added to the call, or that a parent is present with the pupil.
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- If a staff member urgently needs to call a parent or pupil from their personal phone, the number must be withheld by dialling 141 first and a record of the call must be made (e.g. an email to the HSM, DH or DSL to explain the purpose of the call and any actions taken as a result of it).
 - Home filters may block different content at a different level to the school's filtering software; if this appears to be the case for one pupil in the group the teacher should revert to or suggest an alternative resource.
 - Take care that any material provided to students to watch is age and developmentally appropriate. For instance, do not ask Year 9 pupils to watch a film with a 15 rating.
 - Staff should model good online behaviour in all ways, including the language used to interact with pupils and colleagues, which should be respectful at all times
 - School leaders should make clear to staff the operating times for online learning (for example, only during the normal school day); no staff member should engage with or respond to any pupil outside these times.
 - Clear guidelines for students connecting to a virtual classroom session will be given by the school and the teacher will check their understanding.
 - The same principles apply to virtual meetings between staff and parents as face-to-face meetings.

Further helpful resources for digital learning:

- DfE advice for schools: [teaching online safety in schools](#)
- UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#)
- UKCIS [External visitors guidance](#) helps schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors.
- NSPCC: [Undertaking remote teaching safely](#)
- PSHE Association: [Guidance for teaching PSHE remotely](#)

29.0 Home visits

Where staff need to make home visits, they should be mindful of their own wellbeing and safety if conducting visits to the homes of children and their families. Follow the school's lone working procedure and guidance. This should prescribe that you must at least inform another member of staff of your whereabouts and the time you plan to return to the school. Wherever possible, arrange for a colleague to accompany you. This is particularly important for visiting households with identified risks to the safety of professionals. You should discuss and assess those risks with the appropriate local authority.

30.0 Policy Review

This policy will be reviewed annually, as a minimum to ensure it is kept up to date with safeguarding issues as they emerge and evolve. Where necessary, updates will be made during the year.

Appendix A Covid 19 and disruption to schools

The impact of the Coronavirus (COVID-19) pandemic on day-to-day learning has reduced significantly and the majority of children should now be in face-to-face learning, however, the school will continue to take steps to minimise the risk of transmission of COVID-19 in their schools and have contingency arrangements in place. Schools might still need to offer remote teaching for children in some circumstances and should continue to have contingency plans in place. The school should continue to be aware of and follow the advice of Public Health England and the local authority.

The School will:

- Keep up to date with the any government guidance or advice and ensure it is followed.
- Follow Public Health England's advice to continue to minimise the risk of infection.
- Have a contingency plan in place, including a remote learning plan in place for pupils to follow and engage in if and when required.
- Staff and children reporting to be symptomatic will be sent home and asked to follow NHS Advice: <https://www.nhs.uk/conditions/coronavirus-covid-19/self-isolation-and-treatment/when-to-self-isolate-and-what-to-do/>
- Communicate any changes in processes to parents/carers.
- Regularly review its arrangements and, where necessary, update its risk assessment.

Each school will have individual arrangements and characteristics that may require site-specific arrangements. In such cases, the Regional Director of the setting should be informed.

All staff should continue to have full regard to KCSIE(2022) and all Outcomes First Group procedures, including the Safeguarding and Managing Allegations against Employees policies. This applies at all times, when working online or offline, remotely or at a setting.

Designated Safeguarding Lead

In circumstances where remote learning takes place, staff and pupils must all know how to contact the DSL and who the deputies are if the DSL is unavailable. A contingency plan should be in place should the DSL become unavailable for work and the current deputising arrangements become depleted. This may be that an alternative senior leader has a buddying arrangement with a DSL from another setting for support should this be required.

Arrangements for reporting and accessing electronic and paper record keeping systems must be in place. If a member of the team is unable to attend work due to self-isolation, they may be able to continue to function as part of the DSL team remotely with this access. Sensitive or confidential case-related information must not be removed from the school to take to another location for remote working. Consider other mechanisms to access the information securely.

Arrangements

- Each head/principal must inform the placing local authority if a child will be accessing off-site education. Ensure a record of the communication and any response received from the local authority is held at the school.
- Sensitive or confidential case-related information must not be removed from the school to take to another location for remote working. Consider other mechanisms to access the information securely.
- As an absolute minimum requirement, during term-time, the school must make **weekly** contact with children and young people who are not attending school in person. This should be over the telephone or through virtual communications platforms.

School Policy

- There will be arrangements to maintain contact with some children and young people during holidays. This will be considered on a case-by-case basis.
- If the school is unable to make contact with any child or young person this must be considered as a potential safeguarding or child protection matter and make a referral through local safeguarding arrangements.
- The guidance in Section 28.0 of this policy for Digital and Remote Learning must followed.

Practice Guidance

It is important that each individual child's circumstances are considered. Decisions should be based on the child's best interests. Arrangements need to be communicated clearly with parents and carers.

The following steps should be taken to agree a plan in respect of individual pupils:

- A risk assessment must be undertaken for each child. This should consider any health-related vulnerabilities of the child or members of their household (if known), any specific online risks and any child protection concerns.
- For every child with an allocated social worker, the most suitable course of action in the circumstance should be agreed with both the placing authority or local authority and/or their parent or carer. The rationale for the decision, the people involved in the decision-making, and the date and time of the discussion should be recorded clearly on the child's record.
- For any children subject to child protection plans, the local authority has a duty to remain in contact and see the child at least every 10 working days. Arrangements must be made to enable this to happen. As a key agency in the child's life, the school will commit to maintain contact with them. How this done is a matter for individual consideration.
- For children in need (As defined in section 17 of The Children Act 2004) we should recognise that these families require support, and the local authority has an obligation to provide that. You should ask the allocated social worker what the arrangements will be to support the child and family and what their expectations are of the school. The outcome of this discussion must be recorded.
- For any child or young person receiving early help services or subject to non-statutory multi agency plans. The manager or allocated worker for that child must be contacted by the school to establish how regularly the child will be seen and what the expectations are of the school to maintain contact with that child or provide support for the family.
- Each head/principal must inform the placing local authority if a child will be accessing off-site education. Ensure a record of the communication and any response received from the local authority is held at the school.
- As an absolute minimum requirement, during term-time, the school must make **weekly** contact with children and young people who are not attending school in person. This should be over the telephone or through virtual communications platforms.
- There will be arrangements to maintain contact with some children and young people during holidays. This will be considered on a case-by-case basis.

If the school is unable to make contact with any child or young person this must be considered as a potential safeguarding or child protection matter and make a referral through local safeguarding arrangements.

We are part of the Outcomes First Group Family, by working together we will build incredible futures by empowering vulnerable children, young people and adults in the UK to be happy and make their way in the world.

**Outcomes
First
Group.**

Acorn Education And Care
National Fostering Group
Options Autism