

Safeguarding Policy

Based on guidance issued by the Secretary of State, the latest of which is Keeping Children Safe in Education, Department for Education (DfE), September 2020.

This policy was revised on 1st April 2021 by Diane Anderson - Head of Safeguarding (Designated Safeguarding Lead).

This policy includes our schools' procedures for dealing with allegations of abuse against staff .

This policy should be considered in conjunction with our behaviour, anti- bullying, pupils leaving the school without consent, equalities, e-safety, whistleblowing, attendance, healthy schools, first aid & medication, health & safety including risk assessments policy.

KEY CONTACTS & POLICY REVIEW INFORMATION

Designated Safeguarding Lead	<p>DIANE ANDERSON</p> <p>head@freshstepsindependentschool.org.uk</p> <p>02088035827</p>
Deputies Designated Safeguarding Lead	<p>Miss Shomari</p> <p>primary@freshstepsindependentschool.org.uk</p>
Board of Governors	<p>Mike Vance Semone Thompson Elaine Cato-Dixon Sean Golding</p> <p>Via: admin@freshstepsindependentschool.org.uk</p>

COVID-19

The school has made some visual changes around the school in order to keep all safe. The school has now incorporated a one-way system. Please contact the school for further updates.

INTRODUCTION

FreshSteps understands that our work in safeguarding and protecting children must always have regard for the national guidance issued by the Secretary of State and should be in line with local

guidance and procedures. This policy is therefore written with due regard to national guidance, the latest of which is Keeping Children Safe in Education (September, 2020) and Working Together to Safeguard Children (March,2018).rev February. Our school procedures for safeguarding children are also compliant with the London Child Protection Procedures produced by the London Safeguarding Children Board.

A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children.
2. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Children includes everyone under the age of 18.

All staff at FreshSteps know that a range of other school policies are central to many aspects of the schools' child protection & safeguarding policy, and this document should therefore be read in conjunction with our policies for:

Anti-Bullying -

Attendance

Behaviour

Online Safety

Equalities

Medical needs

First aid

Health & Safety

Healthy Schools

Risk Assessment

Whistleblowing

All adults working with, or on behalf of our school must always follow all our procedures.

Our policy is regularly updated (as identified on page 1) by the designated safeguarding lead and updates are disseminated to all staff via emails and safeguarding briefings and updates, which are provided on most of staff training days.

The role of school staff

All staff have a responsibility to provide a safe environment in which children can learn.

The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

- What school and college staff should
- look out for Early help

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- 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;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;

Detailed information on early help can be found in Chapter 1 of Working Together to Safeguard Children.

More information on statutory assessments is included at paragraph 48. Detailed information on statutory assessments can be found in Chapter 1 of Working Together to Safeguard Children.

- is misusing drugs or alcohol themselves
- has returned home to their family from care; and
- is a privately fostered child.

(add to page 10 of policy)

KEY POINTS

FreshSteps is committed to safeguarding and promoting the welfare of all our pupils, especially those who are most vulnerable, and expects all staff to share this commitment. Our training mantra and philosophy is to always 'think the unthinkable'.

All staff must be clear about their own role and that of others in providing a caring and safe environment for all children and must know how they should respond to any concerns about an individual child that may arise. To this end, FreshSteps will ensure that all staff know that Diane Anderson, head of safeguarding, is our Designated Safeguarding Lead (DSL) and has overall responsibility for child protection and safeguarding. Though some of the duties inherent to this role can and will be delegated to the deputy DSLs in order that work is completed most efficiently, the ultimate responsibility remains with the DSL for primary and secondary.

All safeguarding leads have received advanced level training from NSPCC in order to undertake their roles and will be safer recruitment trained. All safeguarding leads receive updated training at least every two years; and in addition, keep up-to-date with safeguarding developments at least annually.

SAFEGUARDING MECHANISMS

All staff must also have read, and signed to acknowledge their understanding of, Keeping Children Safe in Education, September 2020. This document must also be kept in all teachers' files to refer back to for any clarification when necessary. At FreshSteps, we ensure that a range of sophisticated and rigorous mechanisms are in place to assist staff to understand and discharge their roles and responsibilities as set out in part one of this policy.

Full safeguarding training, drawing upon the latest national and local guidance, is provided to all staff on an annual basis. Regular safeguarding updates are provided throughout the year to ensure that staff have the most up to date relevant skills and knowledge to safeguard children effectively. Staff who are employed during the school year will receive safeguarding training at the very beginning of their induction period, and at least annually thereafter. This includes training on the **'Prevent' duty and Channel, CSE, honor based violence** and arranged marriages. Domestic abuse, Peer on peer bullying, FGM, Child criminal exploitation: county lines (drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns) homelessness, sexual violence and sexual harassment between children in schools and colleges and **Upskirting**. Staff have had training on mental health and complete online CPD course on mental health. Staff will sign an induction form agreeing that they are aware of their roles and responsibilities, and have read and understood all relevant safeguarding guidance, policies and procedures and agree to implement them.

Highly effective mechanisms are in place to ensure that staff have a clear understanding of the safeguarding & child protection policy and procedures in place, and that these are applied consistently across the school.

Mechanisms include:

- Safeguarding induction
- Whole school annual safeguarding training
- Online safeguarding training
- Safeguarding quizzes
- Safeguarding refresher workshops, which are held on the vast majority of training days

- Twice-termly link meetings between the proprietor and designated safeguarding chair
- Emails to staff regarding key issues, updates and individual passport plans

The child protection register is maintained by the Deputy DSL and all staff working with pupils are informed of all matters relating to children in their classes. In addition to our child protection register, the DSL keeps a cause for concern log which records any and all concerns raised and the actions taken on our written cause for concern forms.

The DSL provides regular feedback to the Headteacher on all safeguarding issues.

All Board members have undertaken all the required safeguarding training, including on 'Prevent' duty and Channel.

FreshSteps will always follow safer recruitment procedures so that we can be confident that all adults working in our school are safe to do so. The Headteacher, deputy and are Safer Recruitment trained. All interviews are undertaken by senior leaders.

All persons who have any contact with children at the school have an Enhanced DBS check prior to working at the school. The Deputy DSL and headteacher will, if informed in advance by the staff member undergoing the DBS check, risk assess the member of staff if the check includes a record of anything that could potentially be cause for concern including any police caution, conviction, reprimand or warning. Whether this risk assessment supports the appointment of the staff member or not, this risk assessment with any supporting investigative documentation will be kept securely and confidentially on file. If a member of staff does not declare anything that could potentially be cause for concern, including any relevant police caution, conviction, reprimand or warning, the applicant will not be appointed to the school.

All children deserve the opportunity to achieve their full potential and the purpose of all intervention is to safeguard and promote the welfare of the child. We are aware that our pupils, all of whom have special educational needs and/or disability are more vulnerable to be subject to abuse and neglect. For example, there could be a reluctance to believe children with special educational needs and/or disability are being abused, limited opportunities for these children to seek help from someone else or a lack of access to support services. As a school, we strive to help safeguard these pupils by ensuring that they are heard, have unlimited access to therapeutic support and liaise with external support services on the family's behalf. For those staff who engage with pupils who experience discrimination in their daily lives or who are from cultures different to those of the professionals, assumption and stereotyping must not be part of our practice. Every effort must be made to ensure that cultural issues are understood and that each individual case is dealt with on its own merits. Teachers and those working in school have daily contact with pupils in their classes and around the school buildings, and as a result have first-hand knowledge of child development and behavioural norms.

This places these professionals in a unique position to identify pupils who would benefit from 'early help' and who are/ or are at risk of abuse. However, teachers, therapists, Ta's and mentors do not decide if something is or is not a child protection issue. Any concerns MUST be passed onto the designated safeguarding lead and/or a member of the leadership team and referred using our cause for concern system (or directly to the LADO, local authority or Channel, if appropriate).

Staff must follow FreshSteps' safeguarding and child protection procedure ('cause for concern' system) if they have any concern regarding a child. However, staff should also be aware that if

there is a risk of immediate serious harm to a child, a referral can and should be made to children's social care immediately and that anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration.

Any visitors to the school (not known by the school) will always be accompanied by a member of staff, including social workers, inspectors and external therapists to ensure the safety and wellbeing of pupils. We have a clear vetting procedure, including risk assessment to ensure that any visiting speaker is suitable and appropriate. Heads of schools will be aware of any arrangements and will have a clear understanding as to why they will be coming in to speak. Key staff will always try to select visiting speakers from an established organisation, and appropriate checks should be undertaken to establish the suitability of the person, such as internet searches and/or contacting other schools where the person has spoken previously. All visitors will read key safeguarding information on arrival, while being required to bring appropriate identification. Although viewing DBS certificates may be appropriate, most visiting speakers will not be in 'regulated activity' and so will not necessarily have a DBS certificate to present. Visitors must always be supervised and not left alone with pupils. Visiting speakers should understand that their presentation will be brought to an early end, if the content proves unsuitable. All information about the visiting speaker and the booking process is recorded on a suitable proforma. After the presentation, feedback from staff should be gathered to note any contentious subject areas or comments, and state whether the speaker could be booked again in the future. Once a person has visited a school, future checks should be proportionate. Covid-19 Schools safe guarding mask, hand gels, must have appointment etc and follow all Covid protocols at the school.

RESPONDING TO CONCERNS ABOUT INDIVIDUAL CHILDREN

All Pupils at FreshSteps must be able to place their trust and confidence in any adult working in the school. They must feel sure that they can speak about any worries or concerns they may have and that they will be listened to, taken seriously and responded to appropriately.

All staff must therefore know what to do if a child chooses to talk to them about any matter which raises child protection concerns.

All staff must:

Listen to what the child is saying without interruption and without asking leading questions.

Respect the child's right to privacy but not promise confidentiality reassure the child that he/she has done the right thing in sharing.

Explain to the child that in order to keep him/her safe from harm the information that has been shared must be passed on.

Report what has been disclosed to the DSL as soon as possible, or in their absence, one of the DDSLs

Record, as soon as is practicable, but within 24 hours what was said using the child's actual words on the schools' cause for concern forms. This must be signed and dated.

Remember that if there is a risk of immediate serious harm to a child a referral can and should be made to children's social care immediately and that anybody can make a referral. If the child's

situation does not appear to be improving the staff member with concerns should press for re-consideration.

The DSL will:

Assess any urgent medical needs of the child

Consider whether the child has suffered, or is likely to suffer significant harm

Check whether the child is currently subject to a Child Protection Plan or has been previously subject to a Plan

Confirm whether any previous concerns have been raised by staff.

Only inform the family of the child of any concerns once the duty team leader at social care services has been consulted and their advice sought.

Consider whether the matter should be discussed with the child's family or whether to do so may put the child at further risk of harm because of delay or the family's possible actions or reactions
Seek advice if unsure that a child protection referral should be made.

If the child discloses sexual abuse or sexual abuse is suspected, the child must not be questioned, and the parents must not be informed until social care services and the police child abuse investigation team has been informed and advice given.

Information will be shared on a 'need to know' basis and must be treated in absolute confidence. Staff must not discuss allegations with the child, family members or colleagues.

The DSL will either make a referral to the child's local authority children's services duty or referral and assessment team or, if a referral is not considered appropriate at that stage, make full written records of the information that they have received, detailing the reasons for the judgement that the matter was not referred to the local authority.

The DSL keeps a written/printed records of all contact with other agencies.

All paperwork relating to child abuse is kept securely.

All children who are subject to a Child Protection Plan will have Core Group meetings and Case Conferences organised by social care services. A member of the safeguarding leadership team (DSL or one of the DDSLs) will attend these on behalf of the school. Children are aware that these meetings take place and that the school will be presenting a report at the meetings. The DSL will also act as the school's 'designated teacher', who will liaise with Virtual School headteachers, who are responsible for Children Looked After (CLA). They will provide update information that will be collated for their Pupil Education Plan (PEP).

All staff, including leaders, teachers, therapists and our school nurse monitors children who are subject to a social care services Child Protection (CP) or Child In Need (CIN) Plan.

CHILD PROTECTION – RECOGNITION AND RESPONSE TO ABUSE

Owing to the nature of the day-to-day relationship pupils at Freshsteps have with staff, all adults working in the school are particularly well placed to notice any physical, emotional or behavioural signs that a child may be suffering significant harm. We understand that harm means the ill-treatment or impairment of a child's health and/or development, including that

caused as a result of witnessing the ill-treatment of another person.

All staff must therefore be alert to any possible indicators that a child is suffering harm and report any concerns to the DSL.

All adults working in the schools will receive at least annual whole-school child protection training in order that their awareness to the possibility of a child suffering remains high.

FOR GENERAL ADVICE & GUIDANCE, SEE APPENDIX 1.

FOR CATEGORIES, DEFINITIONS & SIGNS TO LOOK OUT FOR OF CHILD ABUSE, SEE APPENDIX 2.

FOR AN EXAMPLE OF VISITOR SAFEGUARDING INFORMATION, SEE APPENDIX 3.

FOR AN EXAMPLE OF SAFEGUARDING KEY CONTACT INFORMATION, SEE APPENDIX 4.

Enfield Duty Team	0208 379 2767
-------------------	---------------

SAFEGUARDING – PROVIDING A SAFE ENVIRONMENT

All families of Pupils attending FreshSteps must feel secure in the knowledge that they are entrusting their children to adults who will strive to keep them safe at school. We will do this by:

- Promoting a caring, safe and positive environment within the schools
- Ensuring that our staff are appropriately trained in safeguarding and child protection according to their role and responsibilities and keep an up to date record of all training undertaken.
- Encouraging the self-esteem and self-assertiveness of all children through the curriculum so that the children themselves become aware of danger and risk and what is acceptable behaviour and what is not
- Working in partnership with all other services and agencies involved in the safeguarding of children
Displaying appropriate posters that detail contact numbers for child protection helplines (ChildLine)
Always following Safer Recruitment procedures when appointing staff
- Welcoming visitors in a safe and secure manner (all visitors must sign in, read key safeguarding information and wear a visitor's badge)
- Undertaking risk assessments when planning out-of-school activities or trips

Parents and carers are also able to make direct referrals to the local authority children's service duty team if they have a concern about a child or the local authority designated officer (LADO) if they have a concern about a member of staff working at FreshSteps.

SAFEGUARDING & CHILD PROTECTION IN SPECIFIC CIRCUMSTANCES EXTREMISM & RADICALISATION (THE PREVENT DUTY AND CHANNEL)

Since 2010, when the Government published The 'Prevent Strategy' (the key prevention aspect of Contest), there has been an awareness of the specific need to safeguard children, young people and families from extremism. There have been several occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

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

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make pupils and young people vulnerable to future manipulation and exploitation. FreshSteps is clear that exploitation and radicalisation is viewed as a safeguarding concern and must be dealt with accordingly.

ALL staff at FreshSteps must complete Prevent and Channel training as part of their induction and will receive regular briefings and update training.

Our risk assessment if school premises and pupil are in danger is to use the **CLOSE** method

ATTENDANCE & CHILDREN MISSING EDUCATION (CME)

We know that a child's unexplained absence from school could mean that they are at risk of harm and that a child going missing from education is a potential indicator of abuse or neglect. We have a clear attendance policy, and:

Our classes are small, and thus attendance is easy to track closely. Any child going missing from education will always get immediate attention from the DSL. Staff are trained to be alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage

We will always seek to clarify the reason for a child's absence from school with the child's parent or carer as soon as is practicable on the first day

We will always report an unexplained absence of a child with a Child Protection Plan to the child's social worker within one day

We will always report a continued absence (10 or more school days) about which we have not been notified by the parent or carer to the Local Authority's SEN Team and Education Welfare Service

We will always report to the local authority the name of any child who has been newly registered to attend our school but does not arrive on the expected day

We will always report to the Education Welfare Service the continued absence of a pupil known or thought to have been taken overseas if the child does not return to school on the expected return date

We maintain accurate attendance and admissions registers (all pupils are on both), in line with statutory requirements. This includes paying careful attention to off-rolling pupils in association with the local authority and knowing, and recording, pupil destinations consistently on the admissions register. Where a pupil destination is unknown, and unable to be sought after significant follow-up, the local authority, education welfare service and/or social care services will be informed

- We do not 'delete' pupils from the admissions. We alert the child's local authority immediately:
- The pupil has been taken out of school by their parents and are being educated outside the school system e.g. home education
- The pupil has ceased to attend school
- The pupil has been certified as medically unfit to attend school the pupil is in

Keeping local authorities up to date is crucial so that they can check if children of compulsory school age are missing education, and therefore might be in danger of not receiving an education and be at risk of abuse or neglect.

On the rare occasions that we exclude pupils for a fixed-term (of more than 2 days), we put this in writing to both the family and the placing local authority. While we provide the pupil with work to complete during their external exclusion (and mark it), we are not responsible for the pupil's safety and welfare during their time at home.

CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

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

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

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

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

BULLYING (ALL FORMS, INCLUDING CYBER-BULLYING)

We understand that bullying, including cyber-bullying, is harmful to children. We have an anti-bullying policy that sets out our aim of ensuring no pupil becomes a victim of any form of bullying and the work that we carry out in school to foster an environment where bullying behaviour is known to be unacceptable. We will always take seriously any reports of bullying and respond appropriately.

We understand that bullying may take different forms and may include, as examples, racist, sexist, homophobic, transphobic and biphobia behaviours. All staff are clear about the Protected Characteristics, as prescribed in the Equality Act 2010 (see our equality policy). Any such reported or observed incident will be dealt with in accordance with our anti-bullying policy.

ONLINE SAFETY

We recognise that children's use of the internet is an important part of their education but that there are risks of harm associated with its use. We have an e-safety policy that addresses how we seek to minimise those risks in school and teach children how to stay safe when using the internet in their lives outside of school. We also recognise that all members of staff must always be mindful of the need to follow our policy of acceptable use of our IT equipment.

New technologies have become integral to the lives of children and young people in today's society, both within schools and in their lives outside of school. The requirement to ensure that children and young people are able to use the internet and related communications technologies appropriately and safely is addressed as part of our wider duty of care to which all who work in schools are bound. The use of these exciting and innovative tools in school and at home has been shown to raise educational standards and promote achievement.

Unfortunately, the use of these new technologies can put pupils at risk within and outside the school, as a result we have a pro-active monitoring regime which allows us to monitor all internet use. While filters should not over block, as it may place unreasonable restrictions on what pupils can be taught, it is also fundamental to be aware of some of the potential dangers that the internet can pose, including:

- Access to illegal, harmful or inappropriate images, video games or other content
- Unauthorised access to/loss of/sharing of personal information
The risk of being subject to grooming
- Abusive, harassing or misogynistic messages
- The sharing/distribution of personal images without an individual's consent or knowledge (particularly in chat groups).
- Inappropriate communication/contact with others, including strangers Sexting

Implications of geolocation **CYBER BULLYING**

An inability to evaluate the quality, accuracy and relevance of information on the internet

The potential for excessive use which may have a negative impact on the social and

emotional development and learning of the young person.

Material published by pupils and staff in a social context which is considered to bring the schools reputation into disrepute or considered harmful to, or harassment of, another child or member of the organisation will be considered a safeguarding issue and a breach of conduct and behaviour and treated accordingly, as per behaviour, equality, anti-bullying and/or staff conduct policies/procedures.

PEER ON PEER/CHILD ON CHILD ABUSE

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

COUNTY LINES

County lines County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;

- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;

- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;

- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;

- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

SERIOUS VIOLENCE

All staff should be aware of indicators, which may signal that 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 pupils with a family member in prison or who are affected by parental offending.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home

CHILDREN WITH FAMILY MEMBERS IN PRISON

Children with family members in prison Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children

MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM

Modern Slavery and the National Referral Mechanism Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

What school and college staff should do if they have concerns about a child?

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

- If staff have **any concerns** about a child's welfare, they should act on them immediately. See appendix for a flow chart setting out the process for staff when they have concerns about a child.
- If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

Options will then include:

- managing any support for the child internally via the school's or college's own pastoral support processes;
- an early help assessment; or
- a referral for statutory services, for example as the child might be in need, is in need or

suffering or likely to suffer harm.

HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

Sexual Violence and Sexual Harassment between children in schools and colleges

Sexual violence and sexual harassment are not acceptable and will never be tolerated at FreshSteps. Sexual violence and sexual harassment can occur between two children of **any age and sex**. FreshSteps staff will not tolerate or dismiss sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys" and challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breast and genitalia, flicking bras and **lifting up skirts**.

UPSKIRTING

Up skirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence

Dismissing or tolerating such behaviours risks normalising them. Staff should be aware that pupils with SEND and LGBT pupils are at greater risk of Sexual violence and sexual harassment. Evidence shows girls, children with SEND and LGBT children are at greater risk.

The UK Council for Child Internet Safety (UKCCIS) have produced guidance for schools on how to tackle sexting and 'youth produced sexual imagery' as sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives.

This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to child sexual exploitation.

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). Specifically, it is an offence to possess, distribute, show and make indecent images of children.

The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

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

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

Sexual assault A person (A) commits an offence of sexual assault if: if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration. Consent can be withdrawn at any time.

Although the production of such imagery will likely take place outside of school, these issues often manifest in schools working with children and young people. Staff respond swiftly and confidently to ensure that children are safeguarded, supported and educated.

The response to these incidents should be guided by the principle of proportionality and the primary concern always should be the welfare and protection of the young people involved.

All incidents involving sexting and youth produced sexual imagery should be responded to in line with the school's cause for concern

The DSL should hold an initial review meeting with appropriate school staff

There should be subsequent interviews with the young people involved (if appropriate)

Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm

At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

UNDERSTANDING AND REPORTING SEXUAL HARASSMENT

When referring to sexual harassment we mean unwanted conduct of a sexual nature that can occur online and offline.

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

Sexual comments, such as telling sexual stories, making sexual remarks.

"Sexual jokes" or taunting

Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes

A helpline to support potential victims of sexual harassment and abuse in schools is now in effect.

The dedicated number, run by the NSPCC, is to provide both children and adults who are victims of sexual abuse in schools with the appropriate support and advice. This includes how to contact the police and report crimes if they wish. The helpline will also provide support to parents and professionals too.

Sexual abuse in any form is abhorrent and it is vital that allegations are dealt with properly. While FreshSteps takes their safeguarding responsibilities extremely seriously, the school will be determined to make sure the right resources and processes are in place across to support any victims of abuse to come forward.

FreshSteps is committed to ensuring victims feel supported to refer the most serious allegations to the police via the helpline, safe in the knowledge that everything possible will be done to bring offenders to the legal system.

No child or young person should have to experience abuse. But if something isn't right, they should speak to someone they trust to raise concerns, whether that's their peers, a family, a friend, teacher or social worker, helpline or the police.

FreshSteps provides a curriculum to support relationships and sex and education to all secondary pupils and relationships education to all primary age pupils. Important issues such as personal privacy, respect and consent to ensure that more young people have a better understanding of how to behave towards their peers including online.

FreshSteps also have open discussions with pupils about appropriate and inappropriate relationships during assemblies and student voice as well as part of PSHE. We prefer to focus on prevention and early intervention, to help protect children and empower professionals, parents and carers to keep pupils safe.

We will ensure All pupils and parents receive this number to report any sexual crime being committed within school.

The dedicated NSPCC helpline number is 0800 136 663

HEALTH & SAFETY

We have a risk assessment policy and health & safety policies which demonstrate the consideration we give to minimising any risk to the children when on the school premises and when undertaking activities out of school under the supervision of our staff.

The school acknowledges its responsibility to safeguard all pupils in potentially vulnerable situations such as changing in various rooms, while also acknowledging the child's right to privacy. A professional judgement is made based on the age and the developmental needs of the pupils; appropriate supervision is achieved by staff being in close proximity to the rooms pupils are changing in and pupils should be aware of this, knowing that adults will enter the room if necessary.

To ensure that the safety of our pupils there are procedures in place that allow staff to search pupils using a metal detector wand/plastic gloves, this is to make sure that pupils are not bringing inappropriate materials or dangerous weapons into school. There will normally be two members of staff present during the search, and a member of staff who is of the same sex as the pupil will carry out the search. In exceptional circumstances, if there is a risk of serious harm to a person if the search is not carried out straight away, a pupil may be searched by a person of the opposite sex and without another member of staff present.

FEMALE GENITAL MUTILATION (FGM)

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. Female Genital Mutilation affects girls particularly from North African countries, including Egypt, Sudan, Somalia and Sierra Leone. Although our schools have no children from these backgrounds and consider our tiny number of girls in our schools to be safe from FGM, we will continue to review our policy annually and to include it in annual online update training for all staff. School staff should be alert to the following indicators:

- The family comes from a community that is known to practise FGM
- A child may talk about a long holiday to a country where the practice is prevalent
- A child may confide that she is to have a 'special procedure' or to attend a special occasion
- A child may request help from a teacher or another adult

Any female child born to a woman or has a sister who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family.

It is illegal in the UK to allow girls to undergo FGM either in this country or abroad. It is important to note that all staff have a duty to report personally any concerns they may have about girls at risk of FGM to the police. Any concerns must be immediately shared with the DSL and teachers are aware that they have a mandatory duty to report known cases of FGM.

CHILD SEXUAL EXPLOITATION (CSE)

Sexual exploitation can take many forms from the seemingly 'consensual' relationship where

sex is exchanged for attention/affection, accommodation or gifts, to serious organised crime and child trafficking. What marks out exploitation is an imbalance of power within the relationship. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops. Octavia House Schools attempts to identify young people who are vulnerable to, or at risk of, sexual exploitation and who need services and interventions to keep them safe. We will pass on any information about CSE issues affecting the schools, for example concerns about adults hanging around the school, to the police.

ALLEGATIONS FROM PUPILS AGAINST OTHER PUPILS

In most instances, negative conduct of pupils towards each other will be covered by our behaviour and anti-bullying policies. However, some allegations may be of a more serious nature and raise safeguarding concerns. Allegations made against another pupil may include physical abuse (e.g. violence, particularly pre-planned; forcing the use of drugs or alcohol), emotional abuse (e.g. blackmail, extortion, threats, intimidation), sexual abuse (e.g. indecent exposure, touching, sexual assault, sexting, forcing the watching of pornography) and/or sexual exploitation (e.g. photographing or videoing indecent acts).

GANGS

In our new location, gangs are not prevalent but our pupils live in areas which are and our pupils (some with gang membership pasts) are vulnerable to gang membership or re-membership. Older pupils may also attempt to recruit younger pupils using any or all of the above methods. It is also well documented that pupils suffering from sexual exploitation themselves may be forced to recruit other young people, under threat of violence.

MINIMISING THE RISK

It is inevitable in our school that some pupils will present a safeguarding risk to other pupils. An induction system should ensure that we are informed (by SEN, youth service or previous school) as to whether a pupil arrives presenting a safeguarding concern, for example after coming back into school following a period in custody or having experienced serious abuse themselves or risk during school break. Intelligent timetabling, groupings, supervision and personalised risk assessments, including daily dynamic risk assessments, are central to the effective management of safety in our schools. This dramatically reduces the possibility of negative conduct against other pupils, and therefore of allegations.

MANAGING ALLEGATIONS AGAINST OTHER PUPILS

When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern:

- The DSL should be informed as per the usual cause for concern system
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances

The DSL will contact social care services to discuss the It is possible that social care services are already aware of safeguarding concerns around the pupil. The DSL will follow through the outcomes of the discussion and make a social care services referral where appropriate.

The DSL will make a record of the concern, the discussion and any outcome and keep a copy in both pupils' files.

If the allegation indicates a potential criminal offence has taken place, the police will be contacted at the earliest opportunity and parents informed (of both the pupil being complained about and the alleged victim).

It may be appropriate to exclude the pupil being complained about for a period of time, as per our behaviour and anti-bullying policies.

Where neither social care services nor the police accept the complaint, a thorough school investigation will take place in any case, using our internal procedures.

In situations where the DSL considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan which will be monitored and evaluated with all adults working with the pupil.

FORCED MARRIAGE & HONOUR-BASED VIOLENCE

A 'forced' marriage is distinct from a consensual 'arranged' marriage because it is without the valid consent of both parties and where duress is a factor. A child who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the child themselves, of the child's peer group, a relative or member of the child's local community or from another professional. Forced marriage may also become apparent when other family issues are addressed, e.g. domestic violence, self-harm, child abuse or neglect. Forced marriage may involve the child being taken out of the country for the ceremony, is likely to involve non-consensual/under-age sex and refusal to go through with a forced marriage has sometimes been linked to 'honour killing'. Honour-based violence is an ancient cultural tradition that encourages violence towards family members who are considered to have dishonoured their family. It is rooted in domestic violence and is often a conspiracy of family members and associates, meaning victims are a risk for their parents and families.

School staff should respond to suspicions of a forced marriage or honour-based violence by alerting the DSL who will make a referral to Children's Social Care and if the risk is acute, to the Police Child Abuse Investigation Team. School staff should not treat any allegations of forced marriage or honour-based violence as a domestic issue and send the child back to the family home. It is not unusual for families to deny that forced marriage is intended, and once aware of professional concern, they may move the child and bring forward both travel arrangements and the marriage. For this reason, staff should not approach the family or family friends, or attempt to mediate between the child and family, as this will alert them to agency involvement. Further information and advice can be obtained from the Forced Marriage Unit www.fco.gov.uk/forcedmarriage or 020 70080151 and the Honour Based Violence Helpline 0800 599 9247. Again, as with all concerns, please alert the DSL as soon as possible.

DRUGS & SUBSTANCE MISUSE

Fresh steps recognises that young people are at risk from a range of both legal and illegal substances and that substance misuse is an increasing social problem that can have devastating consequences for individuals, their families and the community. The school is committed to the health, safety and welfare of children and will take action to help safeguard their well-being as well as providing support, advice and education about drugs and substance misuse as appropriate. Fresh steps will never condone the misuse of substances, and the possession or supply of illegal drugs, and it will be viewed as a safeguarding concern.

CHILD EMPLOYMENT

Only children over the age of 13 may be employed to do light work. Regulations determine the type of work and restrict the hours a child may be employed for. Children working in the UK who are still of compulsory school age are required to have a work permit in all cases; it is illegal for a child to work and not have a work permit, even if this is in a family business. Different regulations apply to children in entertainment, where children under thirteen may be licensed to perform in commercial performances under strict guidelines and controls. Further information on children in employment can be found at <https://www.gov.uk/child-employment>

PRIVATE FOSTERING

A private fostering arrangement is one that is made privately, without the involvement of a Local Authority, for the care of a child under the age of 16 years of age by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. Each party involved in the private fostering arrangement has a duty to refer it to the Local Authority at least six weeks before the arrangement is due to begin, and not to do so would be an offence. The school has a duty to inform social services if we become aware of a private fostering arrangement that has not been shared with the Local Authority. Although there is no duty for the school to be informed of private fostering arrangements it would be helpful if the family could pass on the information to ensure support can be put in place. Further information on private fostering can be found at <https://www.privatefostering.org.uk>.

WORKING WITH CHILDREN'S FAMILIES CHILDREN'S INFORMATION

We recognise the importance of keeping up-to-date and accurate information about children. We will regularly ask all families to provide us with the following information and to notify us of any changes that occur:

- Names and contact details of persons with whom the child normally lives
- Names and contact details of all persons with parental responsibility Emergency contact details
- Details of any persons authorised to collect the child from school (if different from above)
- Any relevant court orders in place including those which affect any person's access to the child(e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- Name and contact detail of the child's general practitioner

Any other factors which may impact on the safety and welfare of the child

CONFIDENTIALITY

Information about children given to us by the children themselves, their parents or carers, or by other agencies will remain confidential. Staff will be given relevant information only on a "need to know" basis in order to support the child if that is necessary and appropriate.

We are, however, under a duty to share any information which is of a child protection nature. We understand that this is in the best interests of the child and overrides any other duties we have regarding confidentiality and information sharing.

We have a duty to keep any records which relate to child protection work undertaken by us or

our partner agencies and to ensure that these are kept apart from the main child record, stored securely and only accessible to key members of staff. We also have a duty to send copies of these records to any school to which the child transfers.

REFERRALS TO OTHER AGENCIES

If we have a reason to be concerned about the welfare of a child we will always seek to discuss this with the child's family in the first instance. On occasion, according to the nature of our concern, it may be necessary for us to make an immediate referral to social care services when to do otherwise may put the child at risk of further harm either because of delay, or because of the actions of the parents or carers.

ADULTS WORKING WITH CHILDREN SAFER RECRUITMENT

We try to ONLY work with permanent, contracted staff. At times we are forced to use agency staff and recruitment becomes difficult for such settings as Freshsteps. We will ensure that ALL vetting is done prior any agency staff begins work, such has DBS, references, prior checks and phone calls to other establishments. We do not use volunteers, students on placements or any form of temporary worker.

PREPARATION

We will always consider the vacancy that has arisen within the context of safeguarding children and ensure that we include the responsibility to safeguard Pupils within the requirements of the role. We always consider carefully the knowledge, skills and experience required to safeguard children and include these within a person specification.

ADVERTISING

Where we advertise externally, we will always advertise our vacancies in a manner that is likely to attract a wide range of applicants (e.g. on a nationally recognised website such as the TES or CV library). The advertisement will always include a statement about our commitment to safeguarding children and our expectation that all applicants will share that commitment. The advertisement will state that the post is subject to vetting checks, including an enhanced DBS check.

APPLICATIONS

Whatever route an employee joins us, they must complete an application form. Our application form enables us to gather information about the candidate's suitability to work with children by asking specific and direct questions. We scrutinise all completed application forms and do not accept CVs alone. The candidate says that they understand that the post will be subject to vetting checks, including an enhanced DBS check and the prohibition from teaching check and if appropriate, the s128 management check.

Once the closing date has passed, leaders will shortlist the candidates and the candidate will be invited for interview, with an explanation of what they need to do in preparation. This may include bringing appropriate documentation so that a DBS check can be initiated for the successful candidate.

INTERVIEWS

We will always conduct a face-to-face interview

Our interview panel will always contain at least two leaders and all interviewers are safer recruitment trained

Interview questions will seek to ensure that we understand the candidate's values and beliefs that relate to children

All candidates will be asked to bring original documents, which confirm their identity, qualifications, right to work in the UK and any overseas checks

An interview pack which consists of a set of general interview questions (including on safeguarding), interviewers' grades and the decision to appoint/not to appoint, is kept in the employee's file

SELECTION

The interview panel will make its choice by taking all the evidence gathered and the successful candidate will be made a verbal offer of the post. On acceptance of the post candidates are sent a formal offer letter which states that their appointment is subject to confirmation of satisfactory references (where necessary) and an Enhanced DBS disclosure check. Unsuccessful candidates are informed and offered feedback on their performance.

REFERENCES

We never accept open references or testimonials

We always take up at two referees and both must be returned and signed off as 'good' by the deputy head before employment may begin

We ask specific questions about the candidate's previous employment or experience of working with children, including asking about any disciplinary action and any concerns about the candidate working with children

We follow up any vague or ambiguous statements, or any references that provide little or concerning information, with phone calls to the referees

We verify previous employment history, where necessary

For statutory disclosure checks we will ensure that sensitive and confidential use of the applicant's disclosure

VETTING CHECKS RECORDED ON OUR SINGLE CENTRAL RECORD

We carry out Enhanced DBS checks on every member of staff who may come into contact with our children. Though we are not obliged to, we believe it to be good practice to re-check staff every three years, with their permission. All colleagues are required to get a new check when they start working at Fresh steps. Staff are always supervised while the DBS check is being processed (if relevant), and a DBS barred list check is always undertaken before someone commences duties at Fresh steps.

All GOVERNERS ARE DBS

The DSL who is also the head of safeguarding will, if informed in advance by the staff member undergoing the DBS check, risk assess the member of staff if the check includes a record of anything that could potentially be cause for concern including any police caution, conviction, reprimand or warning. Whether this risk assessment supports the appointment of the staff member or not, this risk assessment with any supporting investigative documentation will be kept securely and confidentially on file. This risk assessment must be signed-off by the deputy or headteacher. In any circumstance whereby a member of staff does not declare anything that could potentially be cause for concern including any police caution, conviction, reprimand or warning, the applicant will not be appointed as a member of staff.

We verify, where necessary, that the successful applicant has all the academic or work-related qualifications claimed and request the original academic & professional qualifications and certificates including proof of qualified teacher status (QTS) and Induction completion and do not accept photocopies

We verify the successful candidate's identity and right to work in the UK again with original documents (copied are retained) and through the DBS check process. National Insurance numbers are also recorded on the SCR.

We verify that the candidate has the health and physical capacity for the job using a standard medical questionnaire to highlight any possible medical information that may directly impact on a candidate's job performance (this is completed after the interview process and does not influence the panels' decision to appoint, assuming the candidate is physically able to undertake the duties of the role applied for)

All staff will have a 'prohibition from teaching' check undertaken before they can commence employment.

A S128 prohibition from management check will be carried out if a member of staff joins the senior leadership management team.

AFTER APPOINTMENT

The successful candidate will be sent an e-mail of the post and a contract will be issued in due course.

Our offer of appointment will be conditional on all requested checks having been returned as satisfactory.

We ensure that newly appointed staff are familiarised with all our key policies by issuing them with a policy pack & staff handbook for reading and signing.

All new staff complete an induction with a senior member of staff and a safeguarding induction, which includes familiarisation with Keeping Children Safe in Education(September 2020).

All staff have access to this national document which is online and on our shared drive and must read it and sign, as they do following the safeguarding induction, to indicate their understanding and agreement to adhere to our policies procedures. This is recorded on the SCR and retained in the employee's personnel file.

We will refer to the Disclosure & Barring Service any person whose checks reveal that they have sought work when barred from working with children.

SUPERVISION OF STAFF AND THE MANAGEMENT OF ALLEGATIONS OF ABUSE AGAINST STAFF

We will always supervise staff and act on any concerns that relate to the safeguarding of children. The school non-teaching areas is covered by CCTV throughout and staff are closely monitored at all times, within reason.

Our procedures for managing allegations of abuse against members of staff are simple and clear – the quick resolution of any allegation is an absolute priority. Put simply, allegations made should be reported straight away, normally to the head of safeguarding, head of school or deputy headteacher. The school must then involve the Local Authority's Safeguarding Children Board and Local Authority Designated Officer (LADO) if the allegations require investigation.

In response to an allegation, suspending the member of staff is not the default response, unless there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded by the school's leaders (or proprietor) and the individual notified of the reasons.

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious will not be referred to in employer references.

Pupils who have made malicious allegations are likely to have breached the schools' behaviour policy and will receive an appropriate sanction which is likely to be a fixed-term exclusion.

The procedures for dealing with allegations should be applied with common sense. However, it is important that even allegations that appear less serious are followed-up.

Our procedure is:

The recipient of an allegation must report it to the head of safeguarding, head of school or deputy head as soon as possible and never try to investigate it themselves. If the head of safeguarding is implicated, it must be reported to a head of school, deputy headteacher or if a head of school is implicated, it must be reported to the Head of Lado (Enfield LA). If the deputy head is implicated, it must be reported to the proprietor/ headteacher

A record of the report must be made by the head of safeguarding deputy head / head or proprietor (depending on point 1) which must be timed, dated and include a clearly written name and signature

If the allegation is serious and credible and alleges that a member of staff has a) behaved in a way that has harmed or may have harmed a child, b) possibly committed a criminal offence against or related to a child, or c) behaved towards a child/ren in a way that indicated he/she is unsuitable to work with children, the Local Authority Designated Officer (LADO) should be informed on the same day

If unsure, call the LADO in any case to discuss the allegation.

Such consultation in point 3/4 will enable the LADO and the school leader to consider the nature, content and context of the allegation and agree a course of action.

If this leads to a decision that no further action is to be taken this decision and the reasons for it should be recorded by both the schools' senior leader and the LADO. They should agree between them the information that should be put in writing to the individual about whom the allegation was made. Both should then consider the action that should follow in respect of that individual and also the person (or persons) who made the allegation.

If it is decided that the allegation warrants further action the LADO will take this forward.

The senior school leader or proprietor should inform the accused person about the allegation as soon as possible, but only after consulting the LADO about whether this is appropriate at this stage and what information can be given to the person.

Consideration must be given as to whether it is necessary to remove the subject of the allegations from contact with children at the schools, pending investigations and procedures arising from the allegation. Suspension should not be automatic, but should be considered if: a) there is cause to suspect a child is at risk of significant harm, b) the allegation warrants investigation by the police, or

c) the allegation is so serious that it might be grounds for dismissal

Any decision to suspend shall be taken only after consultation with the LADO. It will take into account the safety of the child or children involved and the impact on any enquiry

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within 24 hours, giving the reasons for the suspension. The person should be informed at that point who their named contact is within the organisation and provided with their contact details.

The subject of the allegations (whether suspended or not) shall be: a) advised to contact her/his trade union or professional association, b) treated fairly and honestly and helped to understand the concerns expressed, processes involved and possible outcomes, c) kept informed of the progress of the case and of the investigation, d) clearly informed of the outcome of any investigation and the implications for disciplinary or related processes and e) provided with appropriate support as appropriate

A school leader, usually the head of safeguarding, head of school or headteacher (be the subject of the investigation), The Chair of BOARD shall be responsible for continuing liaison with Enfield, Hertfordshire or Haringey's LADOs and all communication between the schools and other agencies that may be involved in processes following an allegation

Confidentiality is essential and information about an allegation must be restricted to those who have a need to know in order to: a) protect children, b) facilitate enquiries, c) avoid victimisation, d) safeguard the rights of the person about whom the allegation has been made and others who might be affected and e) manage disciplinary/complaints aspects

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses

WHO WILL LEAD AN INVESTIAGTION IN THE FIRST PLACE?

Concern about...	Who will investigate?
About any member or members of staff below head of school	The head of safeguarding, Diane Anderson
About a head of school or the head of safeguarding	The Board of Governors The Department for Education
About the proprietor	Andreas Kyriacou (Enfield)

The Enfield LADO is...	Maria Anastasi LADO 02083792746/07908139506/079081390010 Maria.anastasi@enfield.gov.uk
The Haringey LADO is...	020 8489 2968

For further information on the management of allegations against staff, please see our whistleblowing policy.

DISMISSAL AND OUR DUTY TO REFER TO THE DBS

Fresh steps is clear about its duty to refer a person who is deemed unsuitable to work with children to the Disclosure & Barring Service (DBS). Specifically, we refer to the DBS any member of staff who:

- is dismissed because of misconduct relating to a child
- leaves their employment during an investigation related to misconduct relating to a child

SAFE PRACTICE

We ensure that all staff are clear about the expectations we have of their behaviour towards all children and that any incident that falls below our expected standards will be dealt with appropriately, as per our staff conduct and disciplinary procedures.

All staff have received physical intervention training and receive very regular training on working with our pupils who have severe and complex social, emotional & mental health difficulties.

CHILDCARE DISQUALIFICATION

Freshsteps is fully aware of the legislation relating to childcare disqualification which can be (for example) for inclusion on the Children's Barred List, being cautioned for specific offences against children/adults, grounds related to the care of children, having childcare/children's home registration refused or cancelled and/or for being disqualified from private fostering. It can also be 'disqualification by association' which is when an employee lives in the same household as somebody who is disqualified. However, as we do not offer early or later years (no children who are aged 8), no childcare provision and no employees at Fresh steps undertake childcare in their roles, it is unlawful for us to ask employees about childcare disqualification or disqualification by association.

THE BOARD – MONITORING & REVIEWING POLICY & PRACTICE

The Education (Independent School Standards) Regulations apply a duty to proprietors of independent schools to ensure that arrangements are made to safeguard and promote the welfare of children.

- The 'Board' at FreshSteps' consists of 4 governors who support and challenge the headteacher.
- Members of the Board ensure that they comply with their duties under legislation and fulfil their duty to remedy any weaknesses that are identified.

Duties and responsibilities include ensuring:

- Policies and procedures are effective and comply with the law
- High quality training is provided to all staff, at all levels. This includes induction training, annual whole school safeguarding training, and regular safeguarding training throughout the year.

All staff have read and understood the child protection and safeguarding policy, code of conduct policy, and part one of the Keeping Children Safe in Education, DfE September 2020 statutory guidance.

Diane Anderson heads the role of Designated Safeguarding Lead (DSL), who has overall responsibility for safeguarding and child protection across the three sites, with deputy designated safeguarding leads in place at each of the school sites

The DSL will continually monitor our child protection and safeguarding practices and bring to the notice of the 'Board' any weaknesses or deficiencies at the termly Board meetings, via an oral report.

The DSL has a termly meeting with the board, who all have a responsibility for safeguarding

The school works very closely with external agencies such as social care services, the police and health services to promote the welfare of pupils, and to protect them from harm

Positive relationships are built with all our families, and appropriate support is put in place

The proprietor and the Board will ensure that appropriate filters and monitoring systems are in place, in both primary and secondary to ensure that pupils are safeguarded from potentially harmful and inappropriate material.

The proprietor and The Board will ensure that children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

The proprietor and The Board will utilise the experiences of the staff team when shaping safeguarding policies and provide regular opportunities for staff to contribute to and shape the safeguarding arrangements and policy.

POLICY REVIEW CYCLE

This policy and all policies at Fresh steps will be reviewed and updated by the safeguarding head and The Board as per our policy review cycle.

APPENDIX 1

INFORMATION & GUIDANCE FOR STAFF

Below is a set of guidelines that staff should take on board when dealing with individual/small groups of children. It is important to be mindful at all times of your behaviour in relationship to individual/small groups of children and of the potential risk of an allegation.

Staff should take necessary precautions in order to minimise the opportunity for an allegation to be made against them. This is generally about exercising common sense, but all staff should specifically take note of the following:

- Whenever possible try not to be alone in a room with a child, regardless of gender. If you are on your own with a child, leave the door open and inform a colleague if possible. Always keep an appropriate distance between you and the child
- Do not engage in conversations about your personal life with children
- Keep boundaries very clear between you and children, particularly if the conversation involves relationships, emotions, and sexual content
- Do not exchange mobile phone numbers with If possible, do not have your mobile phone out when dealing with an individual child
- Do not accept children (or their family members) as 'friends' or links on social networking websites or mobile phone apps

If a child wishes to disclose personal information to you, ensure that they understand that you cannot guarantee confidentiality. Do not probe a child about their personal life unless they approach you. Avoid giving advice to children about their relationships

APPENDIX 2

DEFINITIONS & CATEGORIES OF CHILD ABUSE

All children have certain basic needs, which include:

Physical care and protection

Affection and approval

Stimulation and approval

Discipline and control that is consistent and appropriate to age

Protection Affection and approval Stimulation

The opportunity to gradually acquire self-esteem, confidence, independence and responsibility that are age appropriate.

Individual cases must always be treated on their own merits however in general terms the following definition should provide the bases for action under these guidelines: "A child is considered to be in need of protection when the basic needs of that child are not being met through avoidable acts of either commission or omission".

Before a child is placed on a Child Protection Plan a conference must decide that there is, or is a likelihood of, significant harm leading to the need for a plan. The following are used for the plan. They are intended to provide definitions as a guide; in some instances, more than one category may be appropriate.

NEGLECT

The persistent or severe neglect of a child or the failure to protect a child from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out an important aspect of care, resulting in the significant impairment of the child's health or development, including non-organic failure to thrive.

PHYSICAL ABUSE

Physical injury to a child including deliberately poisoning, where there is definite knowledge, or a reasonable suspicion, that the injury was inflicted or knowingly not prevented.

SEXUAL ABUSE

The involvement of dependent, developmentally immature children and adolescents in sexual activities they do not truly comprehend and to which they are unable to give informed consent, or that violate the social taboos of family roles.

EMOTIONAL ABUSE

Actual or likely severe adverse effect on the emotional and behavioural development of a child caused by persistent or severe emotional ill treatment or rejection. All forms of abuse involve some emotional ill treatment.

NEGLECT

Severe neglect is associated with major retardation of cognitive functioning as well as growth. It is recognised through a typical pattern of poor growth, poor hygiene, withdrawal and in extreme cases a pseudo-autistic state, all of which can rapidly reverse in alternative care.

Although neglect has one of the most pervasive effects on development and is one of the most frequent forms of abuse, it is an area which is frequently neglected by professionals. Like parents, professionals can feel overwhelmed and hopeless by large families living in squalid conditions.

Signs to look out for:

- Dirty unkempt appearance of child, in overall poor condition
- Thin wispy hair. Underweight child, diarrhoea may indicate poor nutrition
- An undernourished child may be unduly solemn or unresponsive, or may be overeager to obtain food
- An under-stimulated child may not reach expected milestones
- Behaviour and developmental difficulties that cannot be explained by clinical factors
- Neglected children frequently come from homes where there is: A parent who is lonely, isolated, unsupported or depressed poor inter-parental relationship / domestic violence
- A parent who is abusing drugs or alcohol
- Many children living in cramped or very poor conditions

PHYSICAL ABUSE (NON-ACCIDENTAL INJURIES)

It should not be assumed that an injury to a part of the body normally vulnerable to accidental injury has necessarily been caused accidentally – it could be non-accidental. All injuries to children, which do not easily come into the category of normal bumps and scrapes, should be seen by a doctor.

Certain parts of the body are more commonly subjected to non-accidental injury. These include the upper arm, where a child may be gripped or shaken, the back, and the buttocks. Multiple injuries of various types, ages and location are common features of physical abuse.

Most non-accidental injuries leave marks on the body. PE teachers are therefore often key people in the identification of this form of abuse, as they regularly see the children partially dressed.

Signs to look out for:

Children who show a reluctance to undress or to expose parts of their bodies should be monitored as children who may have suffered physical injury

- Unexplained absences Physical signs of injury
- Unexplained or confused accounts of how an injury occurred
- Explanation of an injury which appears to be inappropriate to the nature and age of the injury Common medical/physical factors associated with physical abuse

BRUISING

- Facial bruising around the mouth and ears Groups of small bruises
- Black eyes without a forehead injury, particularly if both eyes are affected Weal marks or outline of bruising (e.g. hand mark)
- Bruising of soft tissue with no obvious explanation (most bruises occur on bony protuberances such as the temple or shin)
- Bruises on the back, back of legs, stomach, chest or neck Bruises or cuts to mouth or tongue (e.g. split frenulum)
- Pinch marks are found in pairs and may be seen on the back, buttocks, arms or cheeks

BITES

- Bites leave clear impressions of teeth and some bruising – they are never accidental
- Parents sometimes claim that bites have been made by other children or animals. It is therefore important to check the size and shape of the injury. If the impression is more than 3cms across it will have been caused by an adult or adolescent
- Bites can be inflicted almost anywhere on the body

BURNS AND SCALDS

Children will sometimes suffer minor burns through hot irons etc., but it is uncommon for multiple burns to be caused accidentally

- A cigarette burn is characteristically round, but may have a tail when dragged against the skin, and is surrounded by an area of inflamed skin
- Cigarette burns can be found in groups and can be found on any part of the body Scalds from boiling water may result from lack of supervision, or non-accidentally. A child is very unlikely to sit down willingly in very hot water; therefore, he cannot scald a bottom accidentally without also scalding the feet

Burns and / or scalds are particularly worrying as a degree of sadism may be involved when such injuries are inflicted

ASSOCIATED FACTORS

Injuries not consistent with explanation given by parent (even if agreed by the child) Circumstances where parent delays seeking medical advice

- A history of repeated injuries or presentation to A&E Consent for a medical refused by parent Desire of a parent to attribute blame elsewhere
- Distant or mechanical handling of the child by the parent

SEXUAL ABUSE

The traumatic effects of child sexual abuse can be far-reaching and enduring, impacting on a child's cognitive, behavioural and social development. The earlier the abuse occurs; the more adversely subsequent stages of development may be affected. The longer the abuse continues, the more extensive it is e.g., involving penetrative abuse, the greater the number of developmental stages that abuse continues through, the more disturbed the child is likely to be. Children who have suffered chronic long-term sexual abuse tend to have very negative feelings about themselves and all aspects of their relationships.

What is sexual abuse?

Sexual abuse can be one or more of the following:

- Rape – genital and / or oral intercourse Digital penetration or penetration with an object Mutual masturbation Inappropriate fondling
- Taking pornographic photographs or exposing the child to pornographic materials Forcing the child to observe others involved in sexual activities Sadomasochistic activities

Both boys and girls can suffer from sexual abuse. Both men and women can be perpetrators – boys and girls who disclose sexual abuse from a female perpetrator are often met with disbelief. It is therefore important to listen to what a child says without being judgemental. Abusers can be parents, friends, teachers, childcare workers, clergymen or strangers. Warning children about Stranger Danger should therefore only form part of any child protection programme.

Signs to look out for:

- A child who demonstrates inappropriate sexual interest and activity, through play or drawings
- Sexualised behaviour, masturbation and sex play which often leaves the peer group confused or embarrassed

- A child having excessive preoccupation with, or precocious knowledge of adult sexual behaviours
- A child who shows a marked fear of adults, usually men, but occasionally men and women
- A child who presents as depressed and where there may be instances of drug or alcohol abuse, suicide attempts or running away
- A child who suddenly starts to wet or soil
- A child who takes over the role of wife / mother within the family
- A child whose concentration and academic performance suddenly
 - deteriorates
 - A child who avoids medical examination or is reluctant to change for PE
 - A child who has low self-esteem and few friends
- Aggressive behaviour from a normally quiet child, or withdrawn behaviour from an normally boisterous child
- Frequent unexplained absences or lateness
- A child who talks of nightmares and being unable to sleep; a child who may be excessively tired
- Arson
- Pregnancy in young teenagers where the identity of the father is vague or unknown
- Recurrent urinary tract infections
- Signs of sexually transmitted infections and overall dishevelled appearance

EMOTIONAL ABUSE

Emotional or psychological abuse can be defined as the destruction of the child's competence to be able to function in a social situation. The child may be denied appropriate contact with peers within or outside of school and be forced to take on a particular role in relation to parents, which is detrimental to the child's ability to function appropriately in social contexts. This type of abuse is very difficult to identify as there are no physical signs – symptoms are usually apparent via a child's behaviour and demeanour.

It is important to note that the emotional / psychological abuse is present in all other forms of abuse, but this category is only used when it is the sole form of abuse.

Signs to look out for:

- A child may be inducted into a parental care-taking role and not be encouraged to be involved with appropriate play
- A child may be used as a parent's confidant to a degree that is harmful to the child's psychological development
- A child may be ignored, rejected or denigrated by a parent
- A child may be terrorised by a parent or others so that she / he is overly fearful and watchful

- A parent who is unable to be responsive to a child's emotional needs, who may be emotionally distant and / or excessively negative and hostile
- A child (usually of a mentally ill or disturbed parent) who is inducted into a parent's delusional state or paranoid beliefs
- A child who is cripplingly over-protected and not given freedom to act at an age appropriate

level A parent who provides only conditional love with threats of withdrawal of love

Behavioural definitions are very difficult to quantify because a) most children experience some of these acts from time to time, and b) because the impact of a single or seldom occurring act of abuse will not have severe and harmful effects. The harm of emotional maltreatment results from the cumulative effects of repeated acts of psychological abuse.

ASSOCIATED FACTORS

- Children who suffer from emotional abuse frequently come from homes where there is a mentally ill or disturbed parent
- Drug or alcohol abuse
- A parent who is socially isolated, unsupported or depressed, or conversely, a parent who has a very active social life with very little time or energy to give to child care
- A parent who has poor social skills, who may have learning difficulties and lack of knowledge about children's age appropriate needs
- A parent who has suffered severe abuse within her / his own childhood A household where there is 'adult on adult' domestic violence

Many parents who emotionally abuse their children are unaware that what they are doing is harmful. Because of their own life experiences they may have a distorted view of parenting and their role as a mother / father.

APPENDIX 3

EXAMPLE OF THE VISITOR INFORMATION

WELCOME TO FRESHSTEPS INDEPENDENT

SCHOOL

Nothing is more important than the safety and wellbeing of our pupils. We ask that you take some time to familiarise yourself with some key safeguarding points.

Fresh steps is committed to safeguarding and promoting the welfare of all our especially vulnerable pupils and expects all staff and visitors to share this commitment.

Any visitor to the school will be accompanied at all times by a member of staff to ensure the safety and wellbeing of

Be aware that we have fobbed entrances/doors to ensure the safety of our pupils; please be vigilant when walking through to not let any pupils through the doors or let in any member of the public who you do not know when entering the school.

We have CCTV recording in some areas of the school site for the safety of pupils
and All of our staff have positive handling techniques and de-escalation

If you have a safeguarding or child protection concern please report what has been disclosed to one of our designated safeguarding leads below as soon as possible, who will record and act, if appropriate

Remember that if there is a risk of immediate serious harm to a child a referral can and should be made to children's social care services immediately and that anybody can make a referral.

Designated safeguarding lead Diane Anderson

Deputy DSL's Ms Shomari

Head of safeguarding Diane Anderson/Board of Governors

APPENDIX 4

THE SAFEGUARDING KEY CONTACT INFORMATION

SAFEGUARDING & CHILD PROTECTION KEY

CONTACTS

Diane Anderson

Designated safeguarding lead

0208 8035827

(School based) Shomari Sinclair - Deputy

Designated Safeguarding

lead

0208 8035827

admin@freshstepsindependentschool.org.uk

Mike Vance (off-site) - Board of Governors member

APPENDIX 5

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

This Policy is available to everybody, in hard copy. Please ask reception.