



Safeguarding and Child Protection Policy - Wales

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Region: UK - Wales

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- Wales

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Policy author Tracy Greer, Regional Director of Safeguarding	Reviewed by: Tracy Greer, Regional Director of Safeguarding	Approved by: OneSchool Global UK Board on 06/02/2025
Enquiries contact: support@uk.oneschoolglobal.com	Associated documents • Anti-Bullying Policy • Attendance Policy • Student Discipline Policy • ICT and E-Safety Policy • Complaints Policy • Curriculum Policy documents and schemes of work for PSHE • Data Protection Policy • Disciplinary Procedure • Health & Safety Policy including the following procedures: • Educational Visits • First Aid including arrangements for meeting the medical needs of children • Induction of new staff and volunteers • Additional Learning Needs (ALN) Policy • (The) Prevent Duty Guidance • Safer Recruitment Policy • Security & Visitors Policy • Staff Code of Conduct • Whistleblowing Policy	

1. POLICY STATEMENT

OSGUK Newtown (hereafter 'the Campus') fully recognises the contribution it makes to safeguarding. We will provide a safe and welcoming environment where every child and young person is respected and valued. It is the responsibility of everyone to be alert to the signs of abuse and harm in all its forms and to follow the procedures to ensure that children receive timely and effective support, protection and justice.

This Policy sets out the Campus' commitment to safeguarding, promoting the welfare of children and should be read in conjunction with Welsh Government guidance document no: 283/2022 Keeping Learners Safe 2022.

The purpose of this policy is to provide a framework for how we safeguard and promote students' welfare in accordance with our moral duty and statutory guidance. The policy also informs parents and carers about how we will safeguard their children while they are in our care.

There are three main elements to our policy:

- Prevention through the culture, teaching and pastoral support offered to learners.
- Procedures for identifying and reporting cases, or suspected cases of abuse. Because of our day-to-day contact with children/young people, our staff are well placed to observe the outward signs of abuse; and
- Support to those learners who may have been abused.

The school always considers 'the best interests of the child'.

2. SCOPE

This policy and the associated statutory procedures apply to all staff, volunteers working in the school and its trustees, visitors and parents of both current and prospective students in the campus. It is recognised by this campus that all staff that come into contact with children/young people can often be the first point of disclosure for a child/young person. This first point of contact is an important part of the safeguarding process, and it is essential that all staff are aware of and implement the school's procedures as noted in this policy. We will follow the Wales Safeguarding Procedures that have been endorsed by SCBs. This policy and procedures are consistent with the locally agreed inter-agency procedure for Powys Local Authority Regional Safeguarding Board. We remain vigilant to the indicators of abuse and neglect, adhering to the Wales Safeguarding Procedures 2019 (<https://www.safeguarding.wales/>) to guarantee that learners receive the necessary support, protection, and justice."

The policy is available on the school website and is made available to all staff, Board of Trustees of the proprietor, Local Governance CA team, volunteers, parents, both current and prospective, and visitors to the school.

3. DEFINITIONS

Term	Definition
ACES	Adverse Childhood Experiences (ACEs) are traumatic experiences that occur before the age of 18 and are remembered throughout adulthood. They include child maltreatment such as physical, sexual and verbal abuse and neglect, and wider experiences of household dysfunction, such as growing up in a household affected by domestic violence, parental separation, alcohol and drug use, mental illness or parental incarceration.
ALN	Additional Learning Needs and Disabilities
BROMCOM	School Management Information System
CCTV	Close circuit television
Child	Section 175 of the Education Act 2002 and section 3 of the Social Services and Well-being (Wales) Act 2014 defines a child as a person under the age of eighteen. Anyone who has not yet reached their 18th birthday. For the purpose of the policy this means all students in the Campus and also extends to visiting students from another OSGUK Campus.
Child Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. KCSIE defines four categories of abuse: emotional, physical, sexual and neglect.
Child at risk	The Social Services and Well-being (Wales) Act 2014 defines a “child at risk” as a child who: a) is experiencing or is at risk of abuse, neglect or other kinds of harm; and b) has needs for care and support (whether or not the local authority is meeting any of those needs).
Child in Need	A child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.
Child Protection	Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm as a result of abuse or neglect.
CPOMS	Child Protection On-line Management System
DBS	Disclosure and Barring Service
DfE	Department for Education
DOFA	Designated Officer for Allegations - officers from the local authority designated as being the primary point of liaison in the event of allegations of

	abuse being made against the Campus Principal, principal, proprietor or member of governing body.
DSP	Designated Safeguarding Person – member of staff in school who leads on Safeguarding and Child Protection – both staff training and management of referrals. Referred to as the Designated Safeguarding Lead (DSL at OneSchool Global UK). The DSL must be a Senior Leader.
FGM	Female Genital Mutilation
GDPR	General Data Protection Regulations
HARM	Ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another.
HSB	Harmful Sexual Behaviours
IT	Information Technology
KCSIE	Keeping Children Safe in Education
KLS	Keeping Learners Safe
LA	Local Authority
LADO	Local Authority Designated Officer – officers from the local authority designated as being the primary point of liaison in the event of allegations of abuse being made against the principal, proprietor or member of governing body.
Looked After Child	A child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority.
NLT	National Leadership Team
NSPCC	National Society for the Protection of Cruelty to Children
OSGUK	OneSchool Global UK
Parent	Refers to birth parents and other adults in a parenting role
PEP	Personal Education Plan
PoP	Peer on Peer
Principle of Proportionality	The least intrusive response appropriate to the risk presented.
Promoting the well-being of children	There is an overarching duty to seek to promote the well-being of people who need care and support and carers who need support. The Social Services and Well-being (Wales) Act 2014 defines well-being in relation to any of the following: a) physical and mental health and emotional well-being

	b) protection from abuse and neglect c) education, training and recreation d) domestic, family and personal relationships e) contribution made to society f) securing rights and entitlements g) social and economic well-being h) suitability of living accommodation. In relation to a child, “well-being” also includes: a) physical, intellectual, emotional, social and behavioural development b) “welfare” as that word is interpreted for the purposes of the Children Act 1989.
PSHE	Personal, Social, Health and Education
RSB	Regional Safeguarding Board
RTL	Regional Team Leader
Safeguarding	Safeguarding means preventing and protecting children and adults at risk from abuse or neglect and educating those around them to recognise the signs and dangers. The process of protecting children from maltreatment, preventing the impairment of children’s health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes. This includes all forms of maltreatment including Youth Produced Sexual Imagery, peer on peer abuse, cyber bullying and radicalisation.
SCR	Single Central Record
Significant Harm	Section 31(10) of the Children Act 1989 states that “where the question of whether harm suffered by a child is significant turns on the child’s health or development, his health or development shall be compared with that which could reasonably be expected of a similar child”.
Children’s Services	Refers to Children’s Services in the area in which the child is resident.
Staff	Refers to all those working for or on behalf of the Campus, full time or part time, temporary or permanent, in either a paid or a voluntary capacity.
UKCCIS	UK Council for Child Internet Safety
Well-being	Section 2 of the Social Services and Well-being (Wales) Act 2014 defines well-being as including “welfare” as that word is interpreted for the purposes of the Children Act 1989.

4. CONTACT DETAILS

SCHOOL CONTACT INFORMATION		
Designated Safeguarding Person:		
Lindsay Smith	01686 670152	Lindsay.smith@uk.oneschoolglobal.com
Role on the Senior Leadership Team	Assistant Campus Principal	
Deputy Designated Safeguarding Person:		
Christopher Edwards	01686 670152	Christopher.edwards@uk.oneschoolglobal.com
Other Role in School	Campus Principal	
Designated Senior Mental Health Lead:		
Lindsay Smith	01686 670152	Lindsay.smith@uk.oneschoolglobal.com
Other Role in School	Assistant Campus Principal	
Campus Principal (where the concern is about a member of staff):		
Christopher Edwards	01686 670152	Christopher.edwards@uk.oneschoolglobal.com
Regional Team Leader (where the concern is about the Campus Principal):		
Russell Wells	01686 670152	Russell.wells@uk.oneschoolglobal.com
Safeguarding CA		
Clive Plant	01686 670152	Clive.plant@uk.oneschoolglobal.com
Regional Lead for Safeguarding:		
Tracy Greer	0330 055 5600	Tracy.greer@uk.oneschoolglobal.com
EXTERNAL CONTACT INFORMATION Welsh Students		
Local Authority front door contacts		
Shropshire FPOC	03456 789004	03456 789040 (out of hours)
Powys FPOC	01957 827666	08450 544847 (out of hours)
Multi-Agency Safeguarding Hub (MASH) for initial enquiries about children and young people		
As above		
Local Authority Designated Officer (DO) for allegations against individuals who work with children, including supply staff		

Shropshire LADO	Ellie Jones	03456 789021
Powys LADO	Michael Gedrim	01597 826431
FGM The Diversity Crime Unit	999/101	Online crime reporting
LA Prevent Lead	08000 113764	https://www.gov.uk/report-terrorism
Police (non-emergency)	101	https://www.police.uk/pu/contact-us
Ofsted Safeguarding Children	08456 404046	whistleblowing@ofsted.gov.uk
DfE Dedicated telephone helpline and mailbox for non-emergency advice for Staff & Trustees	020 7340 7264	counter.extremism@education.gov.uk
NSPCC Whistleblowing Helpline	0800 028 0285	help@nspcc.org.uk
CEOP National Crime Agency	0370 496 7622	communication@nca.x.gsi.gov.uk

5. POLICY STATEMENT

5.1 INTRODUCTION

5.1.1 This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard People' 2024 Revised Safeguarding Statutory Guidance, 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if you are worried a child is being abused' 2015, and Prevent Duty Guidance 2023. The policy also reflects, both statutory guidance Keeping Learners Safe (KLS) 2022, Keeping Children Safe in Education (KCSIE) 2025 and Wales Safeguarding Procedures.

5.1.2 The Board of Trustees takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children.

5.1.3 The trustees will work together with other agencies to ensure there are robust arrangements within our Campus to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

5.2 POLICY PRINCIPLES

5.2.1 "The United Nations Convention on the Rights of the Child (UNCRC) emphasizes the significance of children's rights and freedoms, prioritising the best interests of the child. It outlines 54 rights, known as 'Articles,' applicable to all children aged 0-18 years.

Articles 19 and 36 are particularly pertinent, and it is crucial for everyone to understand and uphold these rights:

5.2.1.1 Article 19 - I have the right to be protected from violence, abuse, or neglect.

5.2.1.2 Article 36 - I have the right to be safeguarded from harm."

5.2.2 The welfare and needs of the child are paramount.

5.2.3 At the Campus we maintain an attitude of 'It could happen here'.

5.2.4 Children have a right to feel safe and secure, they cannot learn effectively unless they do so.

5.2.5 All children have a right to be protected from harm and abuse.

5.2.6 Our organisational culture will be one of highly consistent and collective vigilance for the safety and wellbeing of the children in our care, for every child every day.

5.2.7 All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the Campus or in the community, taking into account extra familial harms (previously termed contextual safeguarding), which are incidents and/or behaviours associated with factors outside the Campus and/or occur between children outside of these environments in accordance with statutory guidance. Anyone can make a referral to children's services if this is believed to be in the child's best interests and or the child is at risk of significant harm.

5.2.8 We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.

5.2.9 Whilst the Campus will work openly with parents as far as possible, it reserves the right to contact Children's Services or the Police, without notifying parents, if this is believed to be in the child's best interests and/or the child is at risk of significant harm.

5.3 POLICY AIMS

5.3.1 Safeguarding is defined by Keeping Learners Safe Guidance 2022

<https://gov.wales/keeping-learners-safe> as 'preventing and protecting children from abuse, neglect or other kinds of harm, and educating those around them to recognise the signs and dangers'.

5.3.2 Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

5.3.2.1 protecting children from risk of abuse, neglect or other kinds of harm

5.3.2.2 preventing impairment of children's mental and physical health or development.

5.3.2.3 ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

5.3.2.4 taking action to enable all children to have the best outcomes.

5.3.3 We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult helps to safeguard learners.

5.3.4 Therefore, as part of our Safeguarding Policy the Campus will:

5.3.4.1 Establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to

5.3.4.2 Ensure children know that there are adults in the education setting whom they can approach if they are worried or in difficulty

5.3.4.3 Include in the curriculum, activities and opportunities for relationships and sexuality education which equip children with the skills they need to stay safe from abuse and to know to whom to turn for help

5.3.4.4 Include in the curriculum material that will help children develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills

5.3.4.5 Build relationships with other agencies and ensure early and appropriate referrals for support and intervention are made before risks escalate

5.3.4.6 Take a whole-school (campus) approach to well-being which will incorporate safeguarding and preventative measures to support children and families.

5.3.4.7 Promote a culture of listening to 'the child' and act in their best interest.

a. At the Campus pupils will have the following opportunities to be listened to.

b. At our campus, we conduct regular student voice as part of teaching quality assurance, a worry monster in Key Stage 2 for students to pass on their concerns, weekly GFI that is reviewed by campus staff if less than 6/10, Homeroom teachers that develop good rapport with students to communicate concerns, and a student wellbeing team who liaise with students on wellbeing.

5.4 PROCEDURES

5.4.1 We will follow the Wales Safeguarding Procedures that have been endorsed by SCBs. The campus will:

5.4.1.1 ensure it has a DSP for safeguarding who has undertaken the appropriate training

5.4.1.2 recognise the role of the DSP and arrange support and training via the local authority, and national leadership support.

5.4.1.3 ensure every member of staff and every governor knows:

a. the name of the DSP and their role, the local authority point of contact and the Lead CA for safeguarding

b. that they have an individual responsibility for reporting children at risk and protection concerns to social services, or to the police, within the timescales agreed with the Regional Safeguarding Board

- c. how to take forward those concerns when the DSP is unavailable.
- 5.4.1.4 ensure that all members of staff are aware of the need to be alert to signs of abuse and neglect, and know how to respond to a learner who may disclose abuse or neglect
- 5.4.1.5 ensure that members of staff who are EWC registrants are aware of the Code of Professional Conduct and Practice for registrants with the Education Workforce Council and the expectation within the Code that the registrant has regard to the safety and well-being of learners in their care and related content
- 5.4.1.6 ensure that parents/carers have an understanding of the responsibility placed on the campus and staff for safeguarding and child protection by setting out its obligations in the school brochure
- 5.4.1.7 provide training for all staff so that they:
 - a. understand their personal responsibility
 - b. know the agreed local procedures and their duty to respond
 - c. are aware of the need to be vigilant in identifying cases of abuse and neglect
 - d. know how to support a child who discloses abuse or neglect
 - e. understand the role online behaviours may have in each of the above
- 5.4.1.8 notify the local authority's social services team if:
 - a. a learner on the child protection register is excluded, either for a fixed term or permanently
 - b. there is an unexplained absence of a learner on the child protection register of more than two days' duration from school (or one day following a weekend)
- 5.4.1.9 work to develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at initial review as well as child protection conferences and core groups and the submission of written reports to the conferences
- 5.4.1.10 keep written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to the local authority immediately
- 5.4.1.11 ensure all records are kept secure and in locked locations
- 5.4.1.12 adhere to the procedures set out in the Welsh Government 's Disciplinary and dismissal procedures for school staff: Revised guidance for governing bodies
- 5.4.1.13 ensure that recruitment and selection procedures are made in accordance with Welsh Government 's Keeping learners' safe guidance
- 5.4.1.14 designate a governor for safeguarding who will oversee the school's/college's child protection policy and practice.

5.4.2 We adopt a whole school approach to safeguarding with safeguarding and child protection at the forefront and underpinning all relevant aspects of process and policy development at the Campus.

5.4.3 Where there is a safeguarding concern, staff should take children's wishes and feelings into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously, and they can safely express their views.

6. SUPPORTING THOSE AT RISK

6.1 We recognise that children/young people who are at risk, suffer abuse or experience violence may be deeply affected by this.

6.2 Our setting may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, when at OneSchool Global Newtown Campus, their behaviour may be challenging and defiant or they may be withdrawn.

6.3 The school will endeavour to support the learner through:

6.3.1 the content of the curriculum to encourage self-esteem and self-motivation

6.3.2 the school/college ethos which:

6.3.2.1 promotes a positive, supportive and secure environment

6.3.2.2 gives learners a sense of being valued

6.3.3 the Campus' student discipline policy, which is aimed at supporting vulnerable pupils in the school/college. All staff will agree on a consistent approach that focuses on the behavioural outcome of the child but does not damage the individual's sense of self-worth.

6.3.4 the Campus will endeavour to ensure that the learner knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred.

6.3.5 liaison with other agencies who support the learner such as local authority officers – for example the educational psychology service, behaviour support services or the Education Welfare Service – child and adolescent mental health services, and advocacy services.

6.3.6 keeping records and notifying the local authority as soon as there is a recurrence of a concern.

6.4 When a learner on the child protection register leaves, we will transfer information to the new provider immediately and inform social services.

7. TYPES OF ABUSE

7.1 For signs and indicators of possible abuse neglect and harm in a child, we will refer to the All-Wales Practice Guides that accompany the Wales Safeguarding Procedures. These

procedures assist practitioners in applying the Social Services and Well-being (Wales) Act 2014 and the statutory safeguarding guidance, 'Working Together to Safeguard People.'

7.2 Abuse may fall into the categories of physical, emotional (including regular exposure to domestic violence), sexual, neglect and financial abuse. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They must seek to understand the background and context to make good safeguarding decisions.

7.3 Child abuse is a term used to describe ways in which children are harmed by someone, often in a position of power. It is not the responsibility of Campus staff to decide whether child abuse is occurring, but we are required to act on any concerns, including nagging doubts and report it to the appropriate party. The health, well-being and protection of a child are paramount.

7.4 Abuse is often categorized into five broad categories:

7.4.1 **Physical** is a form of abuse which may involve hitting, slapping, over or misuse of medication, undue restraint, or inappropriate sanctions.

7.4.1.1 Shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of illness in a child.

7.4.2 **Emotional** (including regular exposure to domestic violence)

7.4.2.1 threats of harm or abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks, witnessing abuse of others.

7.4.2.2 the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

7.4.3 **Sexual**

7.4.3.1 involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of

clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

7.4.4 Neglect

7.4.4.1 The Social Services and Well-being (Wales) Act 2014 defines neglect as “a failure to meet a person’s basic physical, emotional, social or psychological needs, which is likely to result in an impairment of the person’s well-being (for example, an impairment of the person’s health or, in the case of a child, an impairment of the child’s development)”.

7.4.4.2 Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

7.4.5 Financial

7.4.5.1 Financial abuse will be less prevalent for a child, but indicators could be:

- a. not meeting their needs for care and support which are provided through direct payments; or
- b. complaints that personal property is missing.

7.4.5.2 child workers without pay, EMA taken by family without child’s consent, child’s belongings sold or missing, benefit claims for the child, which are not real and fabricated illness, misusing allowances/grants for children’s care, inappropriate cars that have been supported by allowances and Motability, children looked after payments being spent, but not to the benefit of the child, by foster carer or kinship carer.

7.4.6 Further examples of abuse which fit into these five categories of abuse are set out in appendix 1

7.5 RECOGNISING SIGNS OF ABUSE

7.5.1 Possible signs of abuse include the following (but are not limited to these and these signs do not necessarily mean that abuse is occurring):

7.5.1.1 the student says that they have been abused or asks a question which gives rise to that inference

7.5.1.2 there is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries

7.5.1.3 the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour. For example, they may become aggressive, challenging, disruptive or withdrawn

7.5.1.4 the student does not want to change clothes in front of others or participate in physical activities

7.5.1.5 the student is having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry

7.5.1.6 the student talks about being left home alone, with carers that appear to be inappropriate or with strangers

7.5.1.7 the student is regularly missing from school or education

7.5.1.8 the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons

7.5.1.9 the student's development is delayed in terms of emotional progress

7.5.1.10 the student suddenly loses or gains weight

7.5.1.11 the student drinks alcohol regularly from an early age

7.5.1.12 the student is concerned for younger siblings without explaining why

7.5.1.13 the student talks about running away

7.5.1.14 the student shies away from being touched or flinches at sudden movements

7.5.1.15 the student demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes

7.5.1.16 the student appears neglected, e.g. dirty, hungry or inadequately clothed

7.5.1.17 the student is reluctant to go home or has been openly rejected by his parents or carers.

7.5.2 Signs of grooming:

7.5.2.1 The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Some actions associated with those grooming children in schools may include:

- a. meeting students secretly, or without seeking authorisation from the Head Teacher
- b. collusive behaviours designed to cultivate dependency, such as
- c. unprofessional conversations about other members of staff
- d. breaking School Rules over providing students with alcohol and

e. 'friending' pupils on social media platforms, contrary to school policy

7.5.2.2 Students who are being groomed at school or elsewhere may:

- a. be very secretive, including about what they are doing online
- b. have unexplained absences
- c. have older pupil friends or girlfriends
- d. go to unusual places to meet friends
- e. have new belongings such as clothes or mobile phones that they can't or won't explain
- f. have access to drugs and alcohol.

7.5.2.3 In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.

7.5.2.4 You may find it useful to refer to the definitions of abuse and neglect in the Social Services and Well-being Act (Wales) 2014 as well as the signs and indicators of abuse and neglect. Further information is available in Appendix 1 (Further Information on Signs of Abuse).

8. ROLES & RESPONSIBILITIES

8.1 The Board of Trustees (The proprietor):

- 8.1.1 Are ultimately responsible as the proprietor to ensure policy, practice and training is in place, and that staff understand and discharge their role and responsibilities in line with Keeping Learners Safe 2022 and KCSIE 2024.
- 8.1.2 Will ensure that the campus meets the requirements of equality legislation under the Equality Act 2010.
- 8.1.3 Will ensure that staff will undergo regular updated safeguarding training, including online safety that is aligned and integral to the whole school Continuing Professional Development (CPD) programme. Whilst considering the training requirements the board will have regard to the professional Standards for Teaching and Leadership, which set out the expectations that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.
- 8.1.4 Will ensure that children are taught about safeguarding, including online safety.
- 8.1.5 Will appoint a member of the National leadership team with governance oversight of safeguarding nationally, a professional lead for safeguarding nationally and a safeguarding CA to oversee local safeguarding governance at each campus.
- 8.1.6 Safeguard and promote the welfare of children to protect them from maltreatment, to prevent impairment of children's health or development ensuring that children grow in

circumstances consistent with the provision of safe and effective care and taking action to enable children to have the best outcomes.

8.1.7 Ensure that there is a mechanism in place to assist all staff, including CAs and volunteers understand and discharge their role and responsibilities to safeguarding in line with Keeping Learners Safe guidance and KCSIE.

8.1.8 Delegate to the Regional Team Leader the responsibility to ensure that all CAs, Campus Principal(s), members of the Senior Leadership Team and middle leaders will be subject to English s128 management checks. If someone is not eligible for a children's barred list check but will be working in a management position in an independent school, a section 128 check should be carried out using the Teaching Regulation Agency's (TRA) employer access service. In addition, the Regional Team Leader is responsible to ensure that safeguarding is a standing agenda item at all CA team meetings and the School Improvement Plan (SIP) includes a section on safeguarding.

8.2 The National Leadership Team will:

8.2.1 Appoint a Safeguarding CA (Member of local governing body) to:

8.2.1.1 take a lead in monitoring that the statutory requirements and procedures set out in this policy are adhered to.

8.2.1.2 Be responsible for undertaking annual reviews on behalf of the National Board of Trustees and evaluation at the Campus of the Safeguarding & Child Protection Policy and procedures in conjunction with the Designated Safeguarding Person and Campus Principal. Provide an annual report to the National Board of Trustees on the safeguarding provision

8.2.1.3 Meet termly at the Campus Impact Meeting (full governance) alongside the DSP/Deputy to discuss updates, reviews and evaluation of the Safeguarding and child protection policies and procedures.

8.2.1.4 Receive training appropriate to their level in accordance with the Welsh National Safeguarding Training, Learning and Development Standards

8.2.1.5 Be trained in child protection and inter-agency working. This training will be updated every two years or in line with the RSB requirements.

8.2.1.6 Attend the half termly Campus Safeguarding Committee

8.2.1.7 Ensure all visitors are vetted and checked prior to working in any way with students and records are kept to show the record of the checks completed

8.2.2 Ensure that a comprehensive annual safeguarding audit is undertaken and that all action points are recorded on the School Improvement Plan and remedied. Ensure that the safeguarding half termly reports are completed, their outcomes discussed, and any learning actioned on the School Improvement Plan. The campus will use appendix 3 of Keeping Learners Safe audit, to audit their practices and processes.

8.2.3 Ensure that safeguarding arrangements take into account policies and procedures of the Local and Regional Safeguarding Boards.

- 8.2.4 Have procedures in place to handle allegations against other children (peer on peer); nudes and semi-nudes and how to handle allegations about staff members, including allegations against the Campus principal and CAs, volunteers or visitors to the school.
- 8.2.5 Ensure the Campus' Safeguarding and Child Protection Policy is available publicly and on the Campus website.
- 8.2.6 Ensure that the DSP and DDSP have time, funding, training, support and resources to undertake their role and to support other staff within the Campus.
- 8.2.7 Ensure that appropriate child protection training is in place (current and up to date) for the DSP and DDSP to a standard set by the RSB and is recorded on the Training Log. If appropriate, ensure that the DSP receives training to promote the educational achievement of children who are looked after.
- 8.2.8 Ensure that new staff members taking on a DSP and DDSP role are appropriately trained by the RSB and receive training appropriate to their level in accordance with the Welsh National Safeguarding Training, Learning and Development Standards.
- 8.2.9 Ensure that appropriate child protection training is in place as part of the induction for all staff including temporary and voluntary staff and that it is updated annually or in line with the RSB requirements and that there is no lapse in training dates. Safeguarding training must always include an element of face to face, interactive training.
- 8.2.10 Liaise with the local authority on child protection allegations against staff, including the Campus Principal, DSP or supply staff.
- 8.2.11 Be aware of and follow the Campus's local arrangements with respect to the statutory safeguarding partners within the local authority area arrangements.

8.3 National Safeguarding Committee will:

- 8.3.1 Ensure that Safeguarding has the appropriate importance and organisational priority.
- 8.3.2 Ensure that OSGUK and all Campuses comply with their safeguarding obligations as set out in relevant legislation, regulations and guidance and any rules issued by OSGUK.
- 8.3.3 Review national trends in safeguarding and child protection, in order to advise on improvements to policy and procedure for all Campuses; make recommendations on safeguarding strategy, policies and practice, including lessons learnt from ineffective practice, in order to ensure that OSGUK and Campus' fulfilment with their safeguarding obligations.
- 8.3.4 Identify and assess the safeguarding risks faced by OSGUK and Campuses and to recommend measures to mitigate those risks including the maintenance of a safeguarding risk register.
- 8.3.5 Hold line management (Regional Principals, Head Teachers / Campus Principals and DSPs) to account on implementation of safeguarding policies in schools.
- 8.3.6 Identify and reflect on issues and patterns of concerns which may require a revision of safeguarding policies or practice.

8.4 National Safeguarding Coordinator will:

- 8.4.1 Provide guidance to all Campuses on policy and procedures related to Safeguarding.
- 8.4.2 Provide advice and guidance to Head Teachers and Safeguarding Trustees in the implementation of the Safeguarding Policy, procedures and for training of staff, parents, volunteers and students.

8.5 Regional Principal and Associate Principal will:

- 8.5.1 Receive training appropriate to their level in accordance with the Welsh National Safeguarding Training, Learning and Development Standards.
- 8.5.2 Be DSL trained with their LA every two years.
- 8.5.3 Be Safer Recruitment Trained every two years.
- 8.5.4 Attend a campuses annual update on safeguarding.
- 8.5.5 On behalf of the proprietor undertake an annual review of safeguarding procedures and policies and how these have been discharged. A report will be provided to the LCA, RTL and this will be shared with the board, the report will make recommendations, where necessary, for improvement or sharing of good practice and to report on its effectiveness to the Board of Trustees.
- 8.5.6 Be aware of Safeguarding referrals having been made, including allegations against staff members. Specific details of referrals relating to children do not need to be shared.
- 8.5.7 Provide professional support in the event of disciplinary procedures against students or adults at the Campus.
- 8.5.8 Not be expected, unless acting as Campus Principal, to advise on specific referrals to the DOS, Children's Services or Police as this would delay the process and conflict with this policy.

8.6 HR CA will:

- 8.6.1 Ensure that the statutory responsibilities for safer recruitment are followed, preventing people who pose a risk of harm from working with children.
- 8.6.2 Ensure that the Safer Recruitment Policy is kept up to date and properly implemented.
- 8.6.3 Ensure safer recruitment procedures are followed before a new member of staff starts work at the campus, including pre-employment checks and vetting of new staff and volunteers working with children and records kept in line with Keeping Learners Safe, KCSIE and the supplementary guidance on disqualification requirements.
- 8.6.4 Ensure that at least one person on a recruitment panel has undertaken safer recruitment training within the last two years.
- 8.6.5 Ensure that all appropriate child protection checks and procedures are applied to staff employed by another organisation such as agency staff working with the Campus' students, and that they are carried out.

8.6.6 Ensure that no barred person is allowed to work in any regulated activity.

8.6.7 These checks must only be carried out:

8.6.7.1 for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced certificate with barred list information from the Disclosure and Barring Service (DBS); or where a person has worked in a school or college in a role that brought them into regular contact with children and young people, and this role ended not more than three months prior to their new appointment.

8.6.8 Have procedures to fulfil the legal duty to make a referral to the DBS, Education Workforce Council (EWC), The Secretary of State via the TRA and, if appropriate, the charity commission in the event of dismissal of staff on safeguarding grounds.

8.7 The Campus will:

8.7.1 Ensure that the Safeguarding Policy and its procedures are implemented and followed by all staff.

8.7.2 Ensure that the DSP and DDSP have the authority, responsibility, time and resources to carry out their roles.

8.7.3 Undertake the Local authority DSP Training every two years.

8.7.4 Ensure that safeguarding, including helping to protect students from a range of risks, including e-safety, is fully explored in teaching and learning opportunities within the curriculum.

8.7.5 Ensure that students are able to identify a trusted adult to listen to their concerns.

8.7.6 Ensure that there is a Safeguarding Notice Board in the Staff Room demonstrating how the Campus keeps children safe, to include e-safety. It will include how to report a concern, training dates, policies, posters, roles and responsibilities of safeguarding personnel, safeguarding up-dates, KEEPING LEARNERS SAFE 2022, KCSIE 2025 and other publications and communications with regard to safeguarding.

8.7.7 Ensure Safeguarding Notices are displayed around the school, at reception and in all communal areas.

8.7.8 Ensure all visitors are presented with an OSG visitor booklet which details the Safeguarding personnel and processes for the Campus.

8.7.9 Ensure all visitors receive a Safeguarding briefing upon visiting the school.

8.7.10 Ensure all visitors are vetted and checked prior to working in any way with students and records are kept to show the record of the checks completed.

8.7.11 Meet with the DSP to be kept informed of on-going investigations.

8.7.12 Be the appointed member of staff to promote the achievement of looked after children.

8.7.13 Be alert to children who go missing and put in place the appropriate safeguarding response.

8.8 Campus Senior Leaders will:

- 8.8.1 Receive training appropriate to their level in accordance with the Welsh National Safeguarding Training, Learning and Development Standards.
- 8.8.2 In addition to the bullet points in 4.6.10, Senior Leaders are expected to read, understand and adhere to the full Keeping Learners Safe 2022 guidance and KCSIE 2025.

8.9 Designated Safeguarding Person (Designated Safeguarding Lead)

- 8.9.1 The role for the DSP is set out in detail in appendix 6 of this policy and is an appendix to job description of the individual concerned.
- 8.9.2 The DSP will be a senior leader within the campus.
- 8.9.3 The DSP will be given the authority, responsibility, time and resources to carry out the role.
- 8.9.4 This can be seen in Appendix 6 of this policy. In summary this includes responsibilities to:
 - 8.9.4.1 have the lead responsibility for managing all safeguarding and child protection concerns. (including online safety) whether in school or at home (see Appendix [8]).
 - 8.9.4.2 be available to discuss safeguarding concerns; should be consulted, when possible, as to whether to raise a safeguarding concern with the local authority; and will manage any immediate actions required to ensure the individual at risk is safe from abuse.
- 8.9.5 Manage referrals to other services.
- 8.9.6 Work with others both within the Campus and external services. It is especially important that the DSP is aware of and follows the Campus's local arrangements with respect to their safeguarding partner arrangements. Please note, local authorities should share with the DSP that a child has a social worker; there are clear powers to share this information under existing duties.
- 8.9.7 Undergo training to provide them with the knowledge and skills required to carry out the role. Training should provide the DSP with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly Children's Services This training should be updated at least every two years.
- 8.9.8 Raise awareness of child protection procedures within the Campus.
- 8.9.9 Ensure that when a child leaves a Campus and they have a Child Protection File that it is transferred to the new school, separately from the main student file, ensuring secure transit and confirmation of receipt.
- 8.9.10 Ensure that either the DSP or DDSP are available at all times during school hours.

8.10 In addition to the Job Description the DSP will:

- 8.10.1 Be a senior member of the Campus staff on the leadership team. The campus principal should not be the lead DSP but may perform a deputy role.
 - 8.10.2 Be trained in institutional grooming and E-Safety; ensure knowledge and skills are kept up to date.
 - 8.10.3 Organise training on child protection, E-Safety and Prevent within Campus for all staff, volunteers and Trustees ensuring that it is current and up-to-date and is recorded on the Training Log.
 - 8.10.4 Ensure that all staff retain clear and well-organised written records of all concerns, discussions and decisions and the reason for those decisions using CPOMS.
 - 8.10.5 Oversee recording and reporting accordingly and monitoring regularly using CPOMS.
 - 8.10.6 Review records regularly so that concerning patterns of behaviour can be identified.
 - 8.10.7 Ensure the safeguarding local arrangements form is up to date and displayed in Reception and all staff working areas in school.
 - 8.10.8 Ensure the Safeguarding display poster is up to date and displayed in reception and key student areas in school.
 - 8.10.9 Complete the Local authority Annual Audit for Child Protection / Safeguarding.
 - 8.10.10 Have appropriate knowledge and training to protect and promote the welfare of a looked after child; holding details of looked after children and their contact information.
 - 8.10.11 Training should provide Designated Safeguarding Leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly Children's Services
 - 8.10.12 Ensure all teachers are trained to manage a report of child-on-child sexual violence and sexual harassment.
 - 8.10.13 Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children (including children with a social worker) are experiencing, or have experienced, with teachers, members of the leadership team and local authorities. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).
- 8.11 Deputy Designated Safeguarding Lead will:
- 8.11.1 Be a member of the Campus staff (Teaching or Support staff). This may also be the Head Teacher.
 - 8.11.2 Be given the authority, responsibility, time and resources to carry out the DDSP's role.
 - 8.11.3 Have DDSP role defined as an appendix to their main job description.
 - 8.11.4 Act in the absence of the DSP fulfilling their duties and responsibilities.

8.11.5 Receive training appropriate to their level in accordance with the Welsh National Safeguarding Training, Learning and Development Standards.

8.11.6 Be trained as a DSP by local authority safeguarding board and be registered for safeguarding and child protection updates in each student locality.

8.12 Campus staff, including supply staff will:

8.12.1 Know who holds the DSP and Deputy roles within the Campus.

8.12.2 Receive training appropriate to their level in accordance with the Welsh National Safeguarding Training, Learning and Development Standards.

8.12.3 Receive annual training and regular updates in safeguarding and child protection, (e.g. minuted staff meetings, e-bulletins etc.). Prevent awareness training and on-line safety will be part of this. Training also applies to the Head Teacher if he/she is not a Deputy DSP.

8.12.4 Be issued with a copy of the KEEPING LEARNERS SAFE, KCSIE Part 1 and Annex B at the start of the Autumn Term or upon their appointment. This will form part of the training for Safeguarding and Child Protection.

8.12.5 Volunteers will receive Keeping Learners Safe and Part 1 of KCSIE.

8.12.6 School Staff and those who work directly with children will also receive

8.12.6.1 Keeping Learners Safe and Part 1 of KCSIE

8.12.7 The school Senior Leadership Team will be required to read all of KEEPING LEARNERS SAFE and KCSIE.

8.12.8 Undertake the Annual Safeguarding Quiz to assess understanding of statutory requirements, which will be signed, dated and recorded along with a statement that they have read and understood the KEEPING LEARNERS SAFE 2022 and KCSIE 2025 guidance.

8.12.9 Adhere to the Staff Code of Conduct.

8.12.10 Be mindful that the English Teacher Standards 2012 state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (teaching staff including Head Teachers).

8.13 Campus Safeguarding Committee will:

8.13.1 ensure that the Campus complies with its safeguarding obligations set out in relevant legislation, regulations and guidance and any rules issued by OSG UK.

8.13.2 review safeguarding practice, in order to ensure the campus' fulfilment of its safeguarding obligations.

8.13.3 work in partnership to ensure that the CSC is properly informed by appropriate information sharing and enabled to act effectively in addition to the specific roles of the DSP and DDSP.

8.13.4 develop a holistic view of the safeguarding arrangements in place for individual students.

8.13.5 identify and reflect on issues and patterns of concerns which may require a revision of safeguarding practice.

8.14 INDUCTION

8.14.1 The detail of the induction for new staff is set out in the Induction Policy. However, from a safeguarding perspective this will include new staff being given copies of:

- a. Safeguarding & Child Protection Policy (including role of the DSP and Children Missing in Education, CME guidance)
- b. ICT & E-Safety Policy
- c. KEEPING LEARNERS SAFE, KCSIE part one and Annex B for those that work directly with children
- d. KEEPING LEARNERS SAFE, KCSIE Part one for volunteers
- e. Behaviour Management Policy
- f. Staff Code of Conduct (including whistleblowing, acceptable use of IT, staff/student relationships and guidance on social media usage).

8.14.2 New staff will receive Face to Face Safeguarding training with the DSP at induction as well as a range of online courses via Flick Learning and will be required to complete a quiz on KEEPING LEARNERS SAFE, KCSIE part one and the Safeguarding & Child Protection Policy.

8.14.3 New staff will receive e safety induction training.

8.14.4 All new staff will receive training on Mental health awareness in young people.

9. PROCEDURES

The following procedures apply to all staff working in the Campus and will be covered by training to enable staff to understand their roles and responsibility. The aim of these procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

9.1 TAKING A DISCLOSURE

- 9.1.1 Stay calm, spend time with the child and use your skill in communicating with children to understand what has gone on. Some key things to consider:
- 9.1.1.1 observe any injuries but should not ask a child to remove or adjust their clothing to observe them.
 - 9.1.1.2 allow the child to lead the discussion. Do take it seriously even if you find it shocking or unlikely.
 - 9.1.1.3 ask open questions. You need to ask enough information to know the immediacy of any danger or significance of harm to the individual. It is not your role to get a detailed account, and the individual may have to tell their story several more times.
 - 9.1.1.4 accept what the student says without challenge – reassure them that they are doing the right thing and that you recognise how hard it is for them.
 - 9.1.1.5 all staff should reassure victims that they are being taken seriously and that they will be supported and kept safe.
 - 9.1.1.6 a victim should never be given the impression that they are creating a problem by reporting concerns, including abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
 - 9.1.1.7 do not criticise the perpetrator.
 - 9.1.1.8 do not make promises on about what will happen next, nor that information provided will not be shared – reassure and explain that they have done the right thing and who needs to be told.
 - 9.1.1.9 staff should not attempt to investigate but should pass on to the DSP or DDSP.
- 9.1.2 Is the disclosure from an individual alleging abuse to themselves or another? Is this the reporting of a concern or suspicion? Does it involve another child, a teacher/volunteer or friends/family away from school?
- 9.1.3 Is the response what you would expect? I.e. has medical attention been sought promptly? Are parents being protective?
- 9.1.4 Is it something that needs addressing right now? Is it something that requires some planning before the end of the school day?

9.2 CONCERNS ABOUT A CHILD

- 9.2.1 If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:
- 9.2.1.1 Record a clear and comprehensive summary of the concern on CPOMS, these should be verbatim notes only, including no opinions or interpretations
 - 9.2.1.2 Alert the DSP via CPOMS
 - 9.2.1.3 Where there is an immediate concern for a child's safety, the member of staff must alert the DSP in person as the first port of call and log on CPOMS as soon as they can

9.2.1.4 If there is any doubt about recording requirements, staff should discuss with the DSP or DDSP

9.2.1.5 The DSP will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSP is not immediately available.

9.2.1.6 DSP must update the record on CPOMS (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including a clear and comprehensive summary of:

- a. Dates and times of their observations
- b. Dates, times and details of any discussions in which they were involved
- c. Any injuries
- d. Explanations given by the child / adult
- e. Any actual words or phrases used by the child
- f. Any decisions made and a clear and comprehensive rationale for the decision
- g. Details of how the concern was followed up and resolved
- h. A note of action taken, decisions reached and the outcome
- i. The records must be signed and dated by the author (or equivalent on CPOMS)
- j. In the absence of the DSP or a DDSP, staff must be prepared to refer directly to Children's Services (and the police if appropriate) if there is the potential for immediate significant harm.

9.2.2 NB: A referral regarding significant harm must be made immediately or at least within 24 hours.

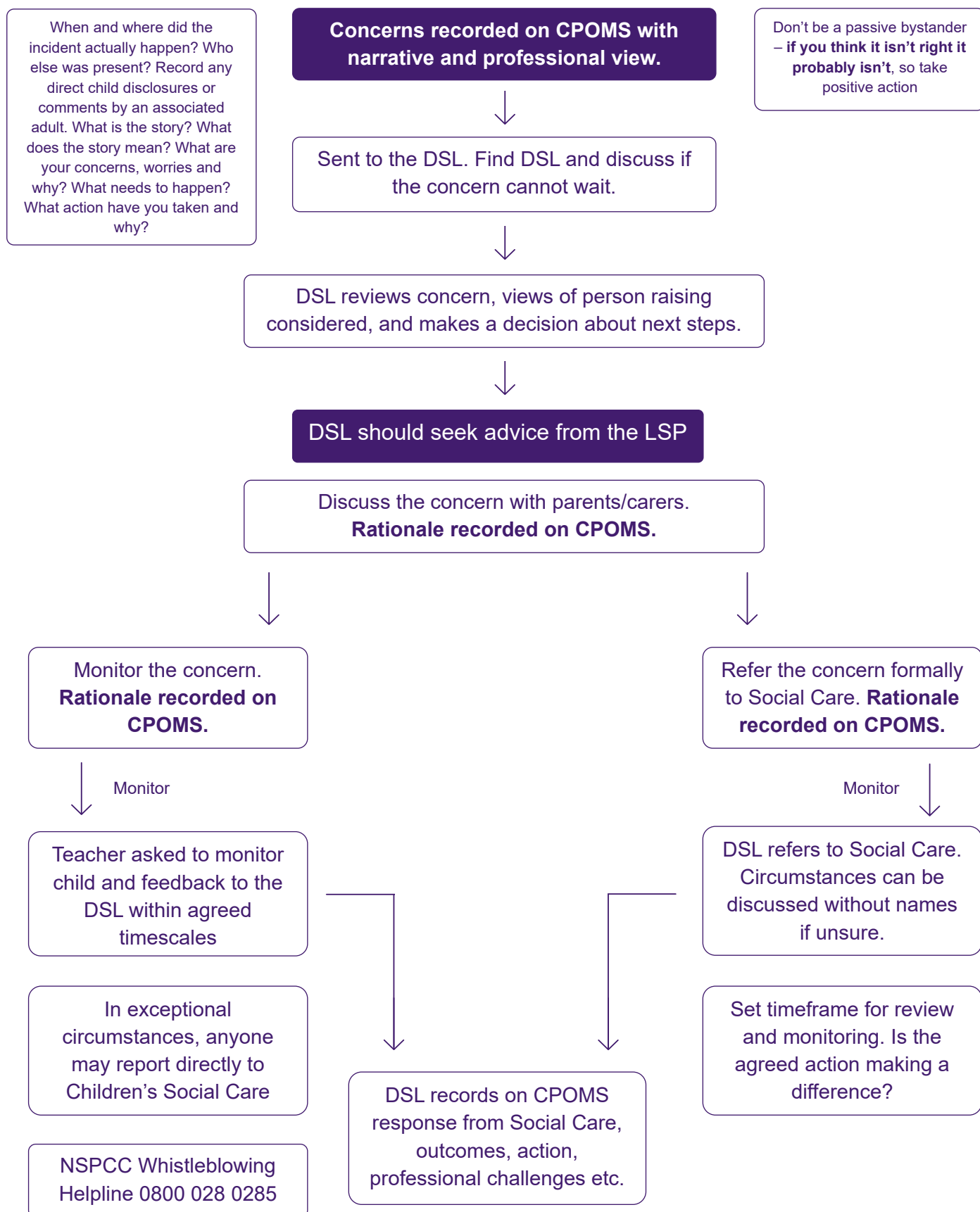
9.3 The initial sharing of information may lead to:

9.3.1 a decision not to take any further action.

9.3.2 a strategy discussion at school, which may lead to Early Help being offered in the case of those who are in need of additional support from one or more agencies but do not meet the threshold for referral to Children's Services. This could lead to inter-agency assessment and intervention using local processes, including the use of the 'Common Assessment Framework' (CAF) and 'Team around the Child' (TAC) approaches.

9.3.3 Making a referral to the police or children's services.

9.4 FLOW CHART FOR RAISING SAFEGUARDING CONCERNS



9.5 PARENTAL CONSENT

- 9.5.1 You should seek advice from the Local authority on whether parents should be informed
- 9.5.2 You should seek to discuss concerns with parents/carers and, where possible seek agreement to make a referral unless this may, either by delay or the behavioural response it prompts place the child at increased risk of Significant Harm.
- 9.5.3 A decision not to seek parental permission before making a referral to Children's Services must be recorded and the reasons given. Likewise, where a parent has agreed to a referral this must be recorded and confirmed on the relevant Referral Form.
- 9.5.4 Having taken full account of the parent's wishes if it is still considered that there is a need for a referral:
 - 9.5.4.1 The reason for proceeding without parental agreement must be recorded
 - 9.5.4.2 The Children's Services team should be told that the parent has withheld her/his permission.

9.6 INFORMATION AND DATA SHARING

- 9.6.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The school has clear powers to share, hold and use information for these purposes.
- 9.6.2 All matters relating to child protection will be treated as confidential and only shared in accordance with the Working Together to Safeguard People guidance and the Terms of Reference of the Campus Safeguarding Committee.
- 9.6.3 The DSP must understand and convey to staff the relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
- 9.6.4 The Board of Trustees will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:
 - 9.6.4.1 understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
 - 9.6.4.2 being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
 - 9.6.4.3 not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or

another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

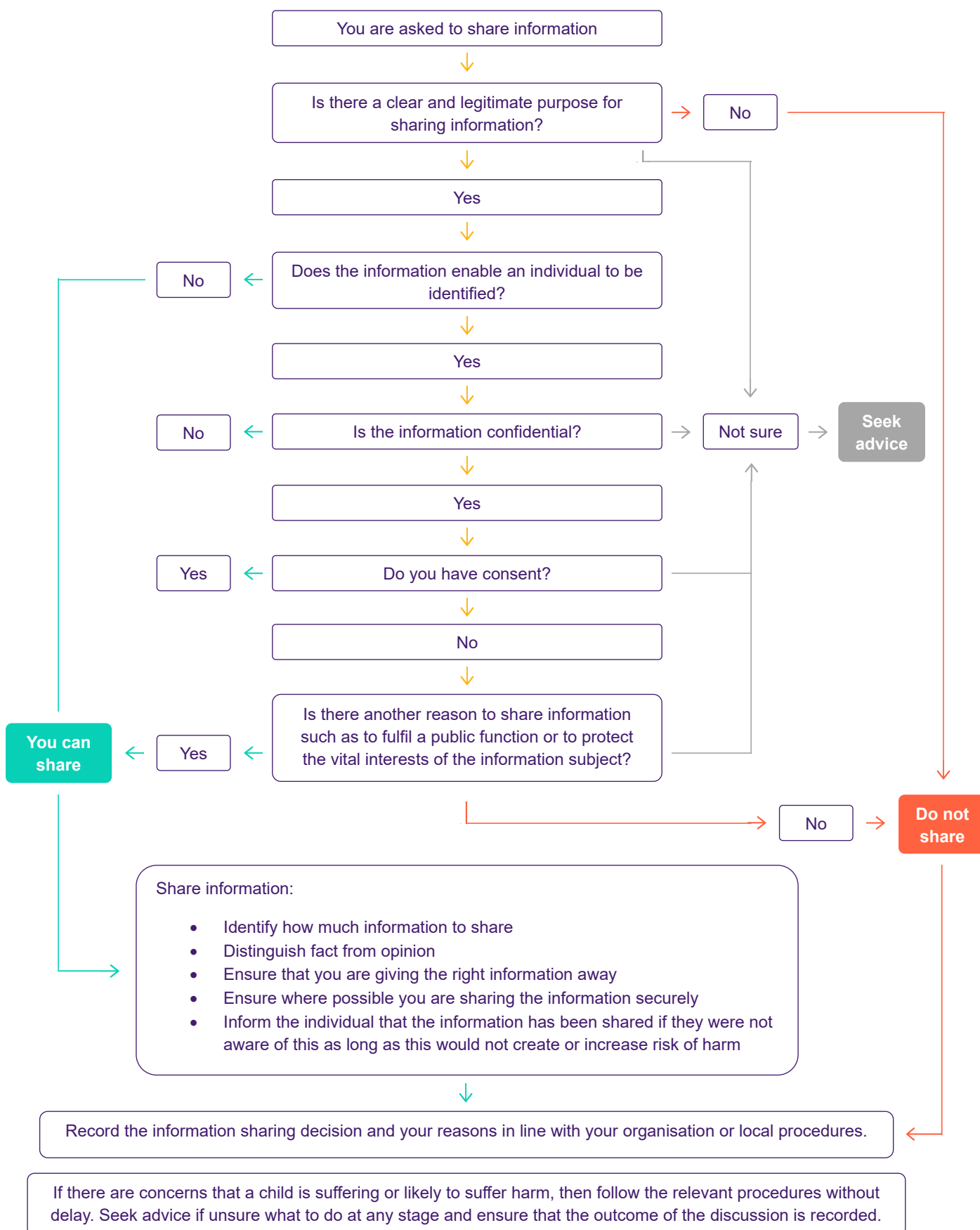
9.6.5 Information will be shared with staff within the Campus on a 'need-to-know' basis.

9.6.6 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

9.6.7 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential, and the Head Teacher or DSP will only disclose information about a child to other members of staff on a need-to-know basis.

9.6.8 All staff will always undertake to share the intention to refer a child to Children's Services with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

9.7 FLOW CHART TO GUIDE INFORMATION SHARING



9.8 MAKING A REFERRAL

- 9.8.1 Practitioners are expected to report to the relevant local authority social services department for children at risk. The relevant authority is the one in which the safeguarding concern is thought to have occurred. This may mean reporting to a local authority that is not in the same area as that in which the practitioner works. If a practitioner is unsure which local authority to report to, they should contact their local social services department for advice.
- 9.8.2 Any concerns about staff members should be referred to the Designated Officer Safeguarding (DOS) from the area the Campus is based.
- 9.8.3 When deciding whether to make a referral following an allegation or suspicion of abuse the DSP should ensure they understand all the background and context to the allegation. What happened, when, who was present, what was said as well as the DSP's professional opinion and the action taken are incredibly important. If there is any doubt as to the threshold for referral, then this Campus will discuss the matter initially on a no names basis with the Local Authority.
- 9.8.4 What appears minor at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus, the Campus should not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse. That said it is important to ask open questions in order to gain a reasonable understanding of all the circumstances. It is also very important to record exactly what was asked and what was said in response. This will be recorded on CPOMS.
- 9.8.5 Children's Services assessments will consider where children are being harmed in contexts outside the home, so it is important that campuses provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm
- 9.8.6 For English students, Keeping Children Safe in Education 2025 sets out that within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required.
- 9.8.7 This will include determining whether:
- 9.8.7.1 The child requires immediate protection and urgent action is required
 - 9.8.7.2 The child is in need, and should be assessed under section 17 of the Children Act 1989
 - 9.8.7.3 There is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989
 - 9.8.7.4 Any services are required by the child and family and what type of services, for example Early Help Services

9.8.7.5 Further specialist assessments are required to help the local authority to decide what further action to take

9.8.7.6 To see the child as soon as possible if the decision is taken that the referral requires further assessment.

9.8.8 The referrer should follow up if this information is not forthcoming. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment supported by the Designated Safeguarding Lead (or deputy as required).

9.8.9 It is also very important that as professionals we recognise that if we are not content with the response from the Local Authority then we will potentially challenge the outcome utilising the local escalation process. Staff should follow up any referral with the Local Authority in which we do not have an established outcome.

9.8.10 Contact with Children's Services be done tentatively and without giving names in the first instance. However, Children's Services may request more details if they deem it necessary, in which case any details requested will be given.

9.8.11 Outcomes should be communicated to the initial referrer in broad terms if they are a member of staff so that they can be sure they have addressed their statutory responsibility. For others raising concerns that do not have that professional responsibility then confirmation that the matter has been addressed would ordinarily be sufficient. We must be clear the matter has been taken seriously and addressed appropriately.

9.9 ALLEGATIONS MADE AGAINST/CONCERNS RAISED IN RELATION TO TEACHERS, INCLUDING SUPPLY TEACHERS, OTHER STAFF, VOLUNTEERS AND CONTRACTORS

9.9.1 The school has guidance which covers two levels of allegation/concern which must be followed:

9.9.1.1 Allegations that may meet the harms threshold

9.9.1.2 Allegation/concerns that do not meet the harms threshold – referred to as 'low level concerns'

9.9.2 Allegations that may meet the harms threshold

9.9.2.1 This process must be followed where it is alleged that anyone working within the school, including supply teachers, volunteers and contractors has:

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

9.9.2.2 The last point includes behaviour that may have happened outside of school that might make the individual unsuitable to work with children, this is known as transferable risk

9.9.2.3 If in doubt over transferable risk, the campus must always seek advice from the DOS and refer to guidance 'Safeguarding Children in Education handling allegations of abuse against teachers and or other staff' Handling allegations of abuse against teachers and staff | GOV.WALES

9.9.2.4 All concerns / allegations should be raised with the Campus Principal immediately. Where the concern is about the Campus Principal this must be raised with the Regional Team Leader.

9.9.3 Initial response to an allegation

9.9.3.1 Where the school identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact Children's Services and as appropriate the police immediately as per the guidance in KEEPING LEARNERS SAFE 2022 and part 1 of KCSIE

9.9.3.2 When an allegation is made, the DSP is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's services as described in KEEPING LEARNERS SAFE 2022 and part 1 of KCSIE

9.9.3.3 The Case Manager (usually the Campus Principal) should discuss the case with the, the nature, content and context of the allegation and agree a course of action.

9.9.3.4 Should not investigating further until the DO has been informed and has given guidance as to next steps. However, all appropriate actions should be taken immediately to ensure no student is placed at any risk of harm

9.9.3.5 When dealing with allegations the school must:

- a. Apply common sense and judgement
- b. Deal with allegations quickly, fairly and consistently
- c. Provide effective protection for the child and support the person subject to the allegation

Shropshire Local Authority

[Shropshire Safeguarding Community Partnership](#)

Marf for Shropshire - [shropshire-multi-agency-referral-form-may-2024.docx](#)

- 9.9.3.6 The school must be familiar with what initial information the LADO will require.
- 9.9.3.7 When to inform the individual of the allegation should be considered carefully and, on a case-by-case basis, with guidance as required from the LADO, and if appropriate Children's Services and the police.
- 9.9.3.8 If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's services will be convened in accordance with the statutory guidance Working Together to Safeguard People and Working Together to Safeguard Children.
- 9.9.3.9 Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the DSP and make a risk assessment of the situation. It may be necessary for the DSP to make a referral to Children's Services.
- 9.9.3.10 No Further Action: Where the initial discussion leads to no further action the case manager and the LADO should:
- a. Record the decision and justification for it on SCR Tracker
 - b. Agree on what information should be put in writing to the individual concerned and by whom
- 9.9.3.11 Further Enquiries: Where further enquiries are required to enable a decision about how to proceed, the campus must take advice from the LADO on next steps.
- a. The school must follow the same procedure for all staff, including supply staff, volunteers and contractors.
 - b. When involving a supply agency, the school must inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to DBS as personnel suppliers.
 - c. The school must invite the agency's HR Manager or equivalent to all meetings and keeping them up to date with information.
- 9.9.3.12 Governance: If an allegation is made against a CA team member, Member of the National Leadership Team or board, the school must follow its own procedures.
- a. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

9.9.3.13 Suspension

- a. Suspension should not be an automatic response when an allegation is reported. The campus must consider all options to avoid suspension.
- 9.9.3.14 The case manager must consider carefully whether the circumstances warrant suspension from contact with children or until the allegation is resolved.
- 9.9.3.15 It should be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm or the case is so serious there may be grounds for dismissal. If in doubt the case manager to seek advice from the LADO.
- 9.9.3.16 Where the school is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at the school, the school must take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual must not carry out teaching work.
- 9.9.3.17 Working with the People and Culture Business Partner (HRBP) the campus case manager must complete a risk analysis in working with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff:
 - a. Redeployment within the school so that the individual does not come into contact with the child or children concerned
 - b. Providing an assistant to be present when the individual has contact with children
 - c. Redeploying to alternative work in the school so the individual does not have unsupervised access to children
 - d. Moving the child or children to where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views
 - e. Temporarily redeploying the member of staff to another role in a different location, for example another OSG school.
- 9.9.3.18 If immediate suspension is considered necessary, the case manager must record the rationale and justification for such action on SCR Tracker.
- 9.9.3.19 The Campus must show a duty of care to their employees whilst any allegation is being investigated, they should:
 - a. manage and minimise stress caused by the allegation
 - b. inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary
 - c. advise the individual to contact their trade union representative, or a colleague for support
 - d. appoint a named representative to keep the person informed about progress of the case

- e. provide access to counselling or medical advice where appropriate
- f. not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

9.9.3.20 The case manager must take advice from the LADO, police and Children's Services to agree the following:

- a. who needs to know and exactly what information can be shared
- b. how to manage speculation, leaks and gossip
- c. what, if any, information can be reasonably given to the wider community to reduce speculation; and
- d. how to manage press interest if, and when, it should arise.

9.9.4 CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

9.9.4.1 At OSG UK we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

9.9.4.2 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for harm. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

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

9.9.4.4 The purpose of the low-level concerns policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

9.9.4.5 OSGUK will ensure the staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.

- a. Will empower staff to share any low-level safeguarding concerns with the DSP
- b. Address unprofessional behaviour and support the individual to correct it at an early stage
- c. Provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and,
- d. Help identify any weakness in the school or colleges safeguarding system

9.9.4.6 Sharing low-level concerns

- a. Low-level concerns about a member of staff should be reported to the Campus Principal.
- b. Where a low-level concern is raised about the Campus Principal, it should be shared with the Regional Team Leader

9.9.4.7 OSGUK will ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

9.9.4.8 Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, that concern should be shared with the Designated Safeguarding Lead (or deputy), and/or Campus Principal, and recorded in accordance with the school's low-level concern/staff code of conduct policy and their employer notified about.

9.9.5 Recording low-level concerns

9.9.5.1 All low-level concerns should be recorded in writing by the Designated Safeguarding Lead (or deputy).

9.9.5.2 The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

9.9.5.3 At OSGUK these records will be kept confidentially and held securely on SCR Tracker which complies with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

9.9.5.4 Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour

moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

9.9.5.5 Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

9.9.5.6 This information will be retained until that person leaves employment with OSGUK.

9.9.6 References

9.9.6.1 OSGUK will only provide substantiated safeguarding allegations in references as per the guidance in KCSIE.

9.9.6.2 Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

9.9.6.3 It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

9.10 DEALING WITH THE MEDIA

9.10.1 When an allegation is made, the Campus will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 at s141F introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a student from the same Campus (where that identification would identify the teacher as the subject of the allegation).

9.10.2 The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restriction in response to a request to do so. The legislation imposing restrictions makes clear that publication of material leading to the identification of the teacher who is the subject of the allegations is prohibited.

9.10.3 In most cases the LADO at the local authority, Police and Children's Services will have agreed:

9.10.3.1 who needs to know and exactly what information can be shared

9.10.3.2 how to manage speculation, leaks and gossip

9.10.3.3 what, if any, information can be reasonably given to the wider community to reduce speculation

9.10.3.4 how to manage press interest if and when it should arise.

9.10.4 Allegations that are found to have been malicious should be removed from personnel records and any that are not substantiated as malicious should not be referred to in employer references.

9.10.5 OSGUK has a national Communications Strategy. This details how the organisation will respond to serious reputational allegations and the principles of that response and can be found in Appendix 4.

9.11 WHISTLEBLOWING

9.11.1 In line with Keeping Learners Safe and KCSIE Guidance all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding practices and know that such concerns will be taken seriously by the Senior Leadership Team.

9.11.2 Where a member of staff feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, they should reference the schools Whistleblowing Policy; this document includes general guidance and advice on Whistleblowing and details of the NSPCC Whistleblowing helpline.

9.11.3 The NSPCC Whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285. The line is available from 8am to 8pm, Monday to Friday or e-mail: help@nspcc.org.uk.

9.12 SOCIAL MEDIA

9.12.1 Staff are expected to comply with the Trust's ICT and E-Safety Policy, which includes having no contact with students or parents via social media websites, text or personal mobile phones. Any compromise should be brought to the attention of the Campus Leadership Team (CLT) by the staff member concerned.

9.13 COMPLAINTS

9.13.1 Complaints from parents or pupils about the school's response to child safeguarding will be addressed using the Complaints Policy.

9.14 EARLY HELP, CHILD IN NEED, CHILD AT RISK OF SIGNIFICANT HARM

9.14.1 For some children, school may be the one stable place from which they can expect security and reassurance. It is not only about being alert to potential abuse but providing the support to help children through difficult times, providing those with the coping skills that can help avoid situations arising and dealing with the emotional difficulties afterwards if they do.

9.14.2 Local authorities should share the fact a child has a social worker, and the Designated Safeguarding Lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to

share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

9.14.3 Early Help

9.14.3.1 If early help is appropriate, the DSP (or DDSP) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to Children's Services for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

9.14.3.2 The Campus will be prepared to identify children who may benefit from early help. This means providing support as soon as a problem emerges at any point in a child's life. All staff should understand their role in early help and support the assessment process. Staff are encouraged to discuss any early help requirements with the DSP.

9.14.3.3 The DSP will liaise with parents early on to ensure that early help will be effective. If the child or parents refuse consent to an Early Help Assessment, then further advice will be taken from the Local Authority. There may be a requirement to support other agencies and professionals in an early help assessment.

9.14.4 Child in Need

9.14.4.1 A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

9.14.5 Child suffering or likely to suffer significant harm

9.14.5.1 Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

9.15 EXTREMISM, RADICALISATION AND TERRORISM (THE PREVENT DUTY)

9.15.1 The Campus has a statutory duty under The Counter-Terrorism and Security Act 2015 and the statutory Prevent Duty Guidance for England and Wales 2023 to have due regard to the need to prevent people from being drawn into extremist ideology and radicalisation.

9.15.2 Extremism is defined as vocal or active opposition to fundamental values of our society, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

9.15.3 Radicalisation is defined as the act or process of encouraging extremist views or actions in others, including forms of extremism leading to terrorism. Where a student is identified as being at risk of radicalisation, the DSP will consider the level of risk in order to identify the most appropriate referral, this could include Prevent or Children's Services, for example.

9.15.4 Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

9.15.5 The Campus will use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

9.15.6 The Campus will assess the risk of children being drawn into terrorism see appendix 7 the campus will liaise with the LA to discuss what level the risk might be overall in their area - high medium or low.

9.16 CHILDREN ABSCONDING OR GOING MISSING FROM AN EDUCATIONAL SETTING

9.16.1 Should a child abscond or go missing it is a potential for abuse and neglect, and the Campus has a procedure in place detailed in the Attendance/Missing in Education Policy to ensure the safeguarding of a child going missing, particularly on repeat occasions. If a child goes missing the following procedure will be applied.

9.16.1.1 First day contact with parents.

9.16.1.2 If, at any stage during the school day a student is unaccounted for, the following procedure will be followed, in order, until the student is located, or the police are informed:

a. The Campus Principal (or the person deputising) is immediately informed, and Reception is contacted to check there is not an authorised absence or departure from school.

b. The student's friends, peers and all staff are asked for information which might explain the absence.

c. A thorough search of site is conducted.

d. A fire drill is conducted.

e. The parents of the missing student are contacted.

f. The Campus Principal (or the person deputising) contacts the police.

9.16.1.3 The risk and time a student could be missing is minimised by the twice daily Registration procedure and individual lesson register taken.

9.16.2 The school must ensure it has two contact numbers on file for every child as stated in KEEPING LEARNERS SAFE 2022 and KCSIE 2025.

9.16.3 The Campus will inform the Children's Services if a child is missing from school for 10 consecutive days or more without permission.

9.16.4 Removal of a Student from Roll:

9.16.4.1 The Campus will notify the Local Authority where the Campus is based when they are about to remove a student's name from the Campus admission register. Full details of the student will be provided to the LOCAL AUTHORITY when removing a student from roll and all reasonable enquiries will be made to establish the whereabouts of the child jointly with the LOCAL AUTHORITY.

9.16.5 Adding a student to Roll:

9.16.5.1 The LA for the child's locality will be informed within 5 days when adding a student to the admission roll at a non-standard transition point. Full details of the student will be provided to the LA.

9.16.6 A non-standard transfer includes transfer into our school at Year 3, as this is not a usual transition point in mainstream education.

9.16.7 This Guidance will also form part of the Admissions Policy.

9.17 PEER ON PEER ABUSE (Child on Child)

9.17.1 This section sets out the Campus' whole school approach to peer-on-peer abuse.

9.17.2 All staff should be aware that children can abuse other children (often referred to as Peer-on-Peer abuse) and that it can happen both inside and outside of school and online. The Campus has a zero-tolerance approach to any form of abuse, including peer on peer.

9.17.3 All staff must be able to identify signs and indicators of peer-on-peer abuse and know how to identify it and respond to reports.

9.17.4 All students must be aware of the systems in place for them to report abuse. This includes the online reporting tool available as well as speaking to their Designated Safeguarding Lead.

9.17.5 All staff should understand, that even if there are no reports in their school does not mean child on child abuse is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse, they should speak to their Designated Safeguarding Lead (or deputy).

9.17.6 It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst

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

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

9.17.7.1 bullying (including cyberbullying, prejudice-based and discriminatory bullying);

9.17.7.2 abuse in intimate personal relationships between peers;

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

9.17.7.4 sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence); For further information about sexual violence see Section 6 of KEEPING LEARNERS SAFE 2022 and Annex B of KCSIE;

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

9.17.7.6 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;

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

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

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

9.17.8 All staff should be clear as to the school's policy and procedures with regards to peer-on-peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. Training will be provided by the DSP at the start of the academic year as well as part of any induction.

9.18 Child on Child Sexual Violence and Sexual Harassment

9.18.1 The Campus will respond to all concerns of child-on-child sexual violence and harassment, including those that happen outside of school premises, and or online.

9.18.2 Staff should be aware and recognise that children and young people might not find it easy to talk about their abuse verbally. Staff should be aware of signs and behaviours that might indicate abuse.

9.18.3 Staff will understand and know that Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into sixth form. It can occur through a group of children sexually assaulting

or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All staff working with children are advised to maintain an attitude of 'it could happen here'.

- 9.18.4 Staff will address inappropriate behaviour (even if it appears to be relatively innocuous). This can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- 9.18.5 Staff should be aware that whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.
- 9.18.6 Staff must ensure that victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 9.18.7 Responding to the Report: All staff will receive training on how to manage a report, this will include:
 - 9.18.7.1 if possible, managing reports with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a deputy). However, this might not always be possible.
 - 9.18.7.2 where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people.' The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
 - 9.18.7.3 recognising that a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
 - 9.18.7.4 recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
 - 9.18.7.5 keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
 - 9.18.7.6 listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where

necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.

9.18.7.7 considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.

9.18.7.8 only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. The notes of such reports could become part of a statutory assessment by Children's Services and/or part of a criminal investigation; and

9.18.7.9 informing the Designated Safeguarding Lead (or deputy), as soon as practically possible, if the Designated Safeguarding Lead (or deputy) is not involved in the initial report.

9.18.8 Risk Assessment: When there has been a report of sexual violence, the Designated Safeguarding Lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

9.18.8.1 the victim, especially their protection and support;

9.18.8.2 whether there may have been other victims;

9.18.8.3 the alleged perpetrator(s); and

9.18.8.4 all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

9.18.9 Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

9.18.10 The Designated Safeguarding Lead (or a deputy) should ensure they are engaging with Children's Services and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's approach to supporting and protecting their pupils and students and updating their own risk assessment.

9.18.11 Action following a report of sexual violence and/or sexual harassment

9.18.11.1 The Designated Safeguarding Lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response.

9.18.12 The DSP should consider: the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.

9.18.12.1 the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexualised Behaviour (HSB) has been displayed.

9.18.12.2 the ages of the children involved.

9.18.12.3 the developmental stages of the children involved.

9.18.12.4 any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?

9.18.12.5 if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).

9.18.12.6 that sexual violence and sexual harassment can take place within intimate personal relationships between peers.

9.18.12.7 are there ongoing risks to the victim, other children, adult students or school or college staff; and

9.18.12.8 other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

9.18.13 As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, the school will follow general safeguarding principles as set out throughout KEEPING LEARNERS SAFE 2022.

9.18.14 Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

9.18.15 The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

9.19 Children Sharing a Classroom

- 9.19.1 Reports of rape and assault by penetration are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing.
- 9.19.2 Whilst the DSP/DDSP establishes the facts of the case and starts the process of liaising with Children's Services and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim.
- 9.19.3 The school will also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).
- 9.19.4 For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school premises and school transport, should be considered immediately. In all cases, the initial report should be carefully evaluated. The wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions.

9.20 Managing the Report of Sexual Violence or Sexual Harassment

- 9.20.1 There are four likely scenarios for the school to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school will decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:

9.20.1.1 **Manage Internally**

- a. In some cases of sexual harassment, for example, one-off incidents, the school may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.
- b. Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.
- c. All concerns, discussions, decisions and reasons for decisions should be recorded on CPOMS

9.20.1.2 **Early help**

- a. In line with 'managing internally' above, the school may decide that the children involved do not require referral to statutory services but may benefit

from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. The DSP and deputies will know what the Early Help process is and how and where to access support.

- b. Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s).
- c. Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.
- d. All concerns, discussions, decisions and reasons for decisions should be recorded on CPOMS.

9.20.1.3 Referrals to Children's Services

- a. Where a child has been harmed, is at risk of harm, or is in immediate danger, the school will make a referral to local Children's Services.
- b. At the point of referral to Children's Services, the school will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of Children's Services.
- c. Where statutory assessments are appropriate, the school (especially the Designated Safeguarding Lead or a deputy) will work alongside, and cooperate with, the relevant lead social worker.
- d. The school will not wait for the outcome (or even the start) of a Children's Services investigation before protecting the victim and other children in the school. The Designated Safeguarding Lead (or a deputy) will work closely with Children's Services (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation.
- e. If a statutory assessment is not appropriate, the Designated Safeguarding Lead (or a deputy) will consider other support mechanisms such as early help, specialist support and pastoral support.
- f. Whatever the response, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.
- g. All concerns, discussions, decisions and reasons for decisions should be recorded on CPOMS.

9.20.1.4 Reporting to the Police

- a. Any report to the police will generally be in parallel with a referral to Children's Services (as above).

- b. The Designated Safeguarding Lead (and their deputies) must be clear about the local process for referrals and follow that process.
- c. Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.
- d. The following should be used to decide when to engage the Police and what to expect of them when they do: When to call the police.
- e. Where a report has been made to the police, the school should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- f. At this stage, the school will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in any decision they take. This should be with the support of Children's Services and any appropriate specialist agencies.
- g. All police forces in England and Wales have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the Designated Safeguarding Lead (and their deputies) are aware of their local arrangements.
- h. In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school continue to engage with specialist support for the victim and alleged perpetrator(s) as required.
- i. Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the Designated Safeguarding Lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school take do not jeopardise the police investigation.
- j. If the school has any questions about the investigation, they will always ask the police.
- k. Whatever the response, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.
- l. All concerns, discussions, decisions and reasons for decisions should be recorded on CPOMS.

9.20.2 The end of the Criminal Process

9.20.2.1 If a child is convicted or receives a caution for a sexual offence, the school will update its risk assessment, ensure relevant protections are in place for all the children at the school and, if it has not already, consider any suitable action in line with their behaviour policy.

9.20.2.2 Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the school. It will be important that the school ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).

9.20.2.3 Where cases are classified as “no further action” (NFA’d) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school will continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. The school should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience

9.20.3 Unsubstantiated, unfounded, false or malicious reports

9.20.3.1 All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing on CPOMS.

9.20.3.2 Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

9.20.3.3 If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children’s Services may be appropriate.

9.20.3.4 If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

9.21 Ongoing Response

9.21.1 The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim taken by the school.

9.21.2 The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim’s daily experience as normal as possible, so that the school is a safe space for them.

9.21.3 Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse.

- 9.21.4 The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- 9.21.5 Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- 9.21.6 The school will be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- 9.21.6.1 Support can include Early help and Children's Services.
- 9.21.6.2 Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence.
- 9.21.6.3 Contact details for ChISVAs can be found at www.RapeCrisis.org.uk and <https://www.thesurvivorstrust.org/>
- 9.21.6.4 Child and adolescent mental health services (CAMHS) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing.
- 9.21.6.5 The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations.
- 9.21.6.6 The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.
- 9.21.6.7 NHS - Help after rape and sexual assault - <https://www.nhs.uk/live-well/sexual-health/help-after-rape-and-sexual-assault/>
- 9.21.6.8 Rape and sexual assault referral centres services can be found at: <https://www.nhs.uk/service-search/other-services/Rape-and-sexual-assault-referral-centres/LocationSearch/364>
- 9.21.6.9 Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.
- 9.21.7 The school will ensure that dialogue is kept open and encouraged, the school will ask the student if they want a dedicated trusted adult in school to talk to about their needs.
- 9.21.8 The school must ensure that they avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups. If required, the school should provide a physical space for victims to withdraw to.

- 9.21.9 The school should be prepared to provide ongoing support for a long time should it be needed.
- 9.21.10 The school must do everything it reasonably can to protect the victim from bullying and harassment as a result of any report they have made.
- 9.21.11 The school must give all necessary support to the victim to remain in school, if however, the victim feels unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents/carers).
- 9.21.12 If the victim does relocate to another educational institution, the new school should be made aware of any ongoing support needs. The DSP should take lead on ensuring that this happens.
- 9.21.13 The school will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- 9.21.14 Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- 9.21.15 Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis.
- 9.21.16 It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour.
- 9.21.17 The school can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The Designated Safeguarding Lead should take responsibility to ensure this happens as well as transferring the child protection file.

9.22 LEARNING SUPPORT – ALN AND DISABILITIES

- 9.22.1 In supporting children at risk, it is recognised that an additional barrier can exist when recognising abuse and neglect of children with Additional Learning Needs and Disabilities. As a consequence, this Campus recognises the potential that extra pastoral support should be considered. This can include:

9.22.2 Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability as opposed to being indicators of abuse.

9.22.3 Children with ALN and disability can be disproportionately impacted by things like bullying without outwardly showing any signs

9.22.4 Communication barriers and difficulties in overcoming these barriers

9.22.5 Children with ALN are at a higher risk of peer group isolation and as a consequence this Campus recognises the potential that extra pastoral support should be considered.

9.23 HELPING CHILDREN TO KEEP THEMSELVES SAFE INCLUDING ONLINE (Including when they are online at home)

9.23.1 Children at the Campus are taught to recognise, self-reflect and manage risk through both the Campus Personal, Social, Health and Economic Education (PSHEE) curriculum and the Relationship and Sex Education (RSE) Curriculum, lessons and rehearsed throughout all aspects of Campus life.

9.23.2 This will include covering relevant issues through Relationships Education and Relationships and Sex Education, online safety week, the Campus tutor-time programme.

9.23.3 Where children are learning online at home the Campus will follow advice from the DfE on safeguarding and remote education (DfE 2021b).

9.23.4 The Campus acknowledges that many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

9.23.5 The Campus has a whole school approach to online safety. The approach is designed to educate pupils, students and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. This should include:

9.23.5.1 discussion about risk, promoting sensible behaviour

9.23.5.2 teaching children how to conduct themselves and how to behave in a responsible manner

9.23.5.3 reminding children about e-safety, mobile devices and tackling bullying procedures

9.23.5.4 The campuses approach to online safety is covered in the ICT and E Safety Policy

9.23.5.5 The main areas of online risk are:

9.23.5.6 Content - exposure to inappropriate or harmful content

9.23.5.7 Contact - being subjected to harmful online interaction with other users

9.23.5.8 Conduct - personal online behaviour that increases the likelihood of, or causes, harm

9.23.5.9 Commerce – Risks such as online gambling, inappropriate advertising, phishing and or financial scams. Where students or staff are at risk of phishing, we will report it to the anti-phishing working group (<https://apwg.org>)

9.23.6 We will never achieve risk-aware young people who can keep themselves safe, by over-blocking content.

9.23.7 There will be training for parents in e-safety, delivered by the Campus, overseen by the DSP. Parent engagement will be tracked, to guide intervention and catch-up for any parents/carers unable to engage.

9.23.8 The Campus promotes an ethos of respect for students, and they must be aware of who to speak to in confidence about any worries they may have, including electronic reporting with the e-safety button.

9.24 ICT & E-SAFETY POLICY

9.24.1 This Campus has a separate ICT & E-Safety policy. It details the roles and responsibilities of the whole school community as well as the method for filtering and monitoring. Breaches are reported in accordance with the ICT & E-Safety policy.

9.24.2 The ICT & E-Safety Policy also covers how to keep students safe whilst learning online at home.

9.25 E-SAFETY REPORTING BUTTON

9.25.1 To ensure that students and school family have access to a confidential and direct reporting system, we have an e-safety reporting button on the main page of our Intranet. The button is for reporting concerns about e-safety, bullying, inappropriate use of computers or the internet. It is labelled as such.

9.26 CHILD CRIMINAL EXPLOITATION: CCE INCLUDING SERIOUS VIOLENCE

9.26.1 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.

9.26.2 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.

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

9.26.4 As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

9.26.5 All staff should be aware of indicators, which may signal children are at risk from or are involved with serious violent crime. These may include:

9.26.5.1 increased absence from school,

9.26.5.2 a change in friendships or relationships with older individuals or groups,

9.26.5.3 a significant decline in performance,

9.26.5.4 signs of self-harm or a significant change in wellbeing,

9.26.5.5 or signs of assault or unexplained injuries.

9.26.6 Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

9.26.7 All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

9.26.7.1 children who go missing for periods of time or regularly come home late; and

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

9.26.8 the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too.

9.26.9 It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. KEEPING LEARNERS SAFE 2022 and KCSIE 2025 Annex B contains additional indicators of CCE. All staff and volunteers will be trained in the signs of CCE.

9.27 CHILD SEXUAL EXPLOITATION (CSE)

9.27.1 CSE is a form of child sexual abuse.

9.27.2 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge.

9.27.3 CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

9.27.4 The victim may have been sexually exploited even if the sexual activity appears consensual.

9.27.5 Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology.

9.27.6 CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

9.27.7 It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (for example through others copying videos or images they have created and posted on social media).

9.27.8 KEEPING LEARNERS SAFE 2022 and Keeping Children Safe 2025 Annex B contains additional indicators of CSE. All staff and volunteers will be trained in the signs of CSE.

9.27.9 Reporting of concerns to the Campus Principal, however low-level the concern may seem, is always essential to highlight early concerns and ensure they are followed up by the Campus Principal. Equally, if there are concerns about the conduct of staff or volunteers, these should be reported to the Campus Principal immediately.

9.27.10 However low level a concern appears, it is critical for it to be followed up straight away.

9.27.11 The Campus will refer to the All-Wales Practice Guides on 'Safeguarding children from child sexual exploitation (CSE)' and 'Safeguarding children where there are concerns about harmful sexual behaviour' in conjunction with Wales Safeguarding Procedures.

9.28 COUNTY LINES

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

9.28.2 Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

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

9.28.4 Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

9.28.5 If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local

services/third sector providers who offer support to victims of county lines exploitation by the DSP at campus.

- 9.28.6 Further examples of indicators of potential involvement in county lines can be found in KEEPING LEARNERS SAFE 2022 and 'Safeguarding children from Child Criminal Exploitation (CCE)' (see www.safeguarding.wales/chi/index.c6.html) – this includes information about abuse related to county lines and other forms of criminal exploitation.

9.29 CHILDREN WITH SEXUALLY HARMFUL BEHAVIOUR

- 9.29.1 The management of children and young people with sexually harmful behaviour is complex and the Campus will work with other agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a student's sexual behaviour should speak to the DSP as soon as possible.

9.30 DOMESTIC ABUSE

- 9.30.1 The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.
- 9.30.2 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 9.30.3 Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.
- 9.30.4 Advice on identifying children who are affected by domestic abuse and how they can be helped is available at: NSPCC UK (www.nspcc.org.uk)
- 9.30.5 All staff and volunteers must be alert and must report any concerns, however low-level they may seem, to the Designated Safeguarding Lead, so that concerns can be reviewed, and patterns of information built up.

9.31 OPERATION ENCOMPASS

- 9.31.1 Operation Encompass was created to support children experience domestic abuse through timely information-sharing between police and schools. This is now being rolled out across Wales. The purpose of Operation Encompass is to enable support to be given to child victims of domestic abuse. Key adults, often the DSP, are identified in all schools involved in Operation Encompass so they have knowledge of domestic abuse and its impact upon children that they can disseminate to all staff. Through

Operation Encompass, schools are able to help children understand what is happening at home and how to best protect themselves both physically and emotionally. The information a school receives also enables them to prepare for the child at school and ensure they have the support they need.

- 9.31.2 Police forces not signed up to Operation Encompass will have their own arrangements in place. All campuses will work and liaise with Operation Encompass teams where applicable

9.32 PHYSICAL PUNISHMENT

- 9.32.1 Any event where a child is punished using physical force can be deemed as physical punishment. In law, physically punishing a child is seen as common assault. In the Children (Abolition of Defence of Reasonable Punishment) (Wales) Act physical punishment is defined as any battery carried out as punishment and referred to as “corporal punishment”.

- 9.32.2 All staff and volunteers must be alert and must report any concerns, to the Designated Safeguarding Person, so that concerns can be reviewed, and action taken.

9.33 FEMALE GENITAL MUTILATION (FGM)

- 9.33.1 (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It is dangerous and a criminal offence and there are no medical reasons to carry out FGM.

- 9.33.2 The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify Police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

- 9.33.3 Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out and discuss such cases with the safeguarding lead (unless they have good reason not to) and Children’s Services. The duty does not apply in relation to at risk or suspected cases. At risk or suspected cases should follow standard safeguarding arrangements.

9.34 MENTAL HEALTH

- 9.34.1 The school has a Mental health and wellbeing policy which raises awareness of mental health signs and potential indicators and responses to mental health concerns and how to support students.

- 9.34.2 All staff must also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- 9.34.3 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

- 9.34.4 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood,

adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

9.34.5 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken in reporting to the Designated Safeguarding Lead at the campus.

9.34.6 The DSP or mental health lead will ensure that all staff undertake mental health awareness training.

9.34.7 The Campus acknowledges that it has an important role to play in supporting the mental health and wellbeing of their pupils.

9.34.8 The Campus has a clear system in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. See Mental Health and Wellbeing Policy.

9.34.9 Where there is a significant concern for a child's mental health and wellbeing the campus will complete a mental health/wellbeing risk assessment, and this will be reviewed at regular intervals in accordance with the Mental Health and Wellbeing Policy.

9.35 FORCED MARRIAGE

9.35.1 A forced marriage is one in which one or both parties do not consent to the marriage but are coerced into it (may include the use of violence and threats). This is not the same as an arranged marriage which is common in many cultures.

9.36 HOMELESSNESS

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

9.36.2 The Designated Safeguarding Lead (and deputy) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

9.36.3 Indicators that a family may be at risk of homelessness include household debt and domestic abuse 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 replace a referral into Children's Services where a child has been harmed or is at risk of harm.

9.36.4 It should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the Designated Safeguarding Lead (or deputy) should ensure appropriate referrals are made based on the child's circumstances.

9.36.5 The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation.

9.37 HONOUR-BASED ABUSE (HBA)

9.37.1 HBA is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is a collection of practices which are used to control behaviour in families and other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators believe that a relative has shamed the family or community.

9.37.2 HBA might be committed against individuals who:

9.37.2.1 Become involved with a boyfriend/girlfriend from a different religion or culture

9.37.2.2 want to get out of an arranged or forced marriage

9.37.2.3 wear clothes or take part in activities that are not considered 'traditional' within a particular culture

9.38 SHARING OF NUDES AND SEMI NUDES IMAGES/VIDEOS (ALSO KNOWN AS SEXTING OR YOUTH PRODUCED SEXUAL IMAGERY)

9.38.1 UK Council for Internet Safety (UKCIS) has published non-statutory guidance on managing incidents of nudes and semi nudes being shared by under-18s. The UKCCIS guidance is non-statutory but should be read alongside KCSIE 2025 and KEEPING LEARNERS SAFE 2022 (Section 7.9, 7.10 and 7.17). It should be followed unless there is a good reason not to do so.

9.38.2 The advice uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nudes or semi-nude images, videos or live streams by young people under the age of 18 online.

9.38.3 Indecent imagery is the legal term used to define nudes or semi-nude images and videos of children and young people under the age of 18. Many professionals may refer to 'nudes and semi-nudes' as: youth produced sexual imagery, youth involved sexual imagery, sexting or image based sexual abuse.

9.38.4 Incidents defined as sharing nudes and semi-nudes include:

9.38.4.1 a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18

9.38.4.2 a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18

9.38.4.3 a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

9.38.5 Incidents not covered by the guidance:

9.38.5.1 the sharing of nudes and semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse and education settings should always inform their local police force as a matter of urgency

9.38.5.2 children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images. Our response should be

guided by the 'principle of proportionality' (see UKCIS Non statutory guidance sharing nudes and semi-nudes' advice for education settings working with children and young people, section 1.6 (a)).

9.38.6 Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18.

9.38.6.1 Indecent is not defined in legislation, indecent imagery does not always mean nudity, however images are likely to be defined as such if they met one or more of the following criteria.

- a. nude or semi-nude sexual posing e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear,
- b. someone nude or semi-nude touching themselves in a sexual way,
- c. any sexual activity involving a child,
- d. someone hurting someone else sexually,
- e. sexual activity that includes animals.

9.38.7 The law criminalising indecent images of children was created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children and young people.

9.38.8 When responding to suspected youth produced sexual imagery the actual images must not be viewed. In determining the response, the DSP will consider if the circumstances are 'experimental' or 'aggravated' (Wolak and Finkelhor, 2011).

9.38.9 If the Campus has decided that involving other agencies is not necessary, consideration should be given to deleting the nudes and semi-nudes from devices and online services to limit any further sharing. It is recommended that students are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated within an agreed deadline. Any refusal to delete the images should be treated seriously, reminding the student that possession is unlawful.

9.38.10 All incidents relating to nudes and semi-nudes being shared must be recorded on CPOMS. This includes incidents that have been referred to external agencies and those that have not.

9.38.11 Incidents that have not been reported out to police or Children's Services, campuses must record their reason for doing so and ensure it is signed off by the Campus Principal.

9.39 UPSKIRTING

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

9.40 PERSONAL EDUCATION PLAN AND LOOKED AFTER CHILDREN

- 9.40.1 Children who are 'looked after' will have their own personal education plan (PEP). The PEP is part of the care plan. It is a record of what needs to happen in order to enable the child to fulfil their potential. It should reflect other education plans such as individual education plans, behaviour plans etc. Staff in this Campus recognise that previously looked after children still remain vulnerable. The DSP will make contact as necessary with the Local Authority personal advisor when individuals leave care.

9.41 SUPPORT IN CAMPUS

- 9.41.1 All class teachers and year group leaders are responsible, in conjunction with other Campus staff, for the pastoral needs of the children in their care. This includes maintaining opportunity for children to share their concerns and follow the guidance in this document. Care should always be taken in regard to the discussion of sensitive issues and advice should be sought from a DSP where there are concerns.
- 9.41.2 Within the curriculum there will also be opportunities to discuss issues which some children might find sensitive. Care should be taken particularly in relation to discussion about families and their make-up. Assumptions about members of families and the presence of both parents should be avoided both in discussion and the presentation of materials. Staff should make themselves familiar with the background of the children in their care in order to avoid distress.

9.42 PHYSICAL CONTACT WITH STUDENTS

- 9.42.1 Physical contact with students must be avoided. The Staff Code of Conduct sets out expectations around professional behaviour.

9.43 RECORD KEEPING

- 9.43.1 Child Protection records should be retained by the last school attended. The long-term security of relevant safeguarding documents and related correspondence is crucial should allegations of abuse arise. All such documents must be securely retained from the date of birth of the student plus 50 years. For further information please refer to the Retention of Records policy.
- 9.43.2 Storage provisions for all such documents must be arranged in the event of the School/Education Trust ceasing operations. Storage in these circumstances would be at the office of a solicitor, accountant or at a professional secure storage company.
- 9.43.3 The following information should be retained for a minimum of 50 years:
- a. A copy of Safeguarding Policies and revisions thereof
 - b. Records of safeguarding training
 - c. Records of abuse allegations or incidents including notification to the appropriate authorities
 - d. Copies of relevant information and accompanying correspondence relating to abuse of students whilst in your care
 - e. Copies of your historical public liability insurance policies

9.44 TRANSFERRING FILES

9.44.1 The DSP is responsible for ensuring that the Child Protection Files are transferred to each school that a child moves to (e.g. primary to secondary) and the transfer must be conducted securely. It is good practice to request a receipt from the accepting school. The DSP will carefully consider what is transferred but it is important to give the receiving school a good understanding of any issues, a clear narrative and action taken. It may well be appropriate for the current DSP to make contact with the receiving school to assist with understanding. If a child has siblings that are staying in the same Campus, it is important to keep a copy of that child's file to retain context/background.

9.44.2 It is important to transfer files of a moving pupil to enable the new school to be prepared for the pupil when they arrive.

9.44.3 The Designated Safeguarding Lead will:

9.44.3.1 ensure transfer of Child Protection Files to the new school without delay, within 5 days. Ask for confirmation of receipt from the receiving school.

9.44.3.2 send separately from the student's general school file.

9.45 PARENT ACCESS TO EDUCATIONAL RECORDS

9.45.1 Other than in exceptional circumstances, Campuses must make available for inspection or provide a copy of a student's educational record if requested to do so in writing by a parent or student. This must be supplied within 30 days of a request.

9.45.2 Educational record means any information processed relating to the student or former student of the Campus which originated from or was supplied by any member of staff, the student themselves or a parent of that student. The Educational Record must not disclose any information which you would be prohibited from sharing with the student themselves under the GDPR 2018 or which that the student would have no right to access themselves such as consider third party information.

9.45.3 In some circumstances access can be refused, for example, providing information about social services or related activities, if disclosure may cause serious harm to the physical or mental health of the student, releasing information that would be likely to prejudice an ongoing criminal investigation or confidential communications between client and professional legal adviser.

9.46 PARTNERSHIP WITH PARENTS

9.46.1 The Campus has an established approach to working with parents – for parents' training and for liaison in the event of a child protection concern.

9.46.2 Key to this is the cultural tone set by the Campus Principal and CA team in terms of what good safeguarding practice looks like and what can be expected.

9.46.3 Parents' and children's need for privacy will be respected, and such a position is supported by the Data Protection Act (GDPR) 2018. However, the priority is the needs of the child and effective liaison is crucial unless such action would put a child or vulnerable adult at risk of harm.

- 9.46.4 It should be recognised that families from different backgrounds and cultures will have different approaches to child-development. These differences should be acknowledged and respected provided they do not place the child at risk.

9.47 PRIVATE FOSTERING

- 9.47.1 Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or close relative. Close relatives are defined by Section 105 Children Act 1989 as a grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or stepparent.
- 9.47.2 To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous. That continuity will not be disrupted by occasional short breaks
- 9.47.3 Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.
- 9.47.4 The school has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.
- 9.47.5 Campus staff should notify the Designated Safeguarding Lead when they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. The Campus itself has a duty to inform the local authority of the private fostering arrangements.
- 9.47.6 On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered, to record this on SIMS and to update records with all changes.

9.48 SAFEGUARDING STUDENTS ON WORK EXPERIENCE

- 9.48.1 The safeguarding of a student on placements for vocational training or work experience will be considered and appropriately risk assessed. Where students on work placements are supervised by someone who is themselves unsupervised, the Campus must obtain an enhanced DBS check for that supervisor before the placement begins. Where the student is under 16 years of age, the Campus must also obtain a barred list check for that supervisor. Campuses cannot obtain a barred list check where the student is aged 16 or 17.

9.49 ONE-TO-ONE TEACHING, EXTENDED SCHOOL AND OFF-SITE-ARRANGEMENTS

- 9.49.1 Where staff are engaged in 1:1 teaching or coaching with students, for example, being coached for a presentation in assembly or sports day event, or receiving

additional support with their studies, staff must ensure that a senior leader is aware of the 1:1 work and at all times, 1:1 discussions with students should most appropriately take place in rooms which are openly visible to other members of staff.

9.49.2 If other organisations provide services or activities on the site, it is the responsibility of the Campus Principal to check that they have appropriate procedures in place, including compliance with safer recruitment procedures.

9.49.3 It is the responsibility of the Campus Principal to check the appropriateness of any visitor to the school (e.g. by open-source internet searches).

9.49.4 When students attend off-site activities, including day visits and work-related activities, the Campus Principal will ensure that effective child protection arrangements are in place. In the case of such alternative provision the Campus should obtain written confirmation that the appropriate safeguarding checks have been conducted.

9.50 VIDEO CONFERENCING AND OFF-SITE ARRANGEMENTS

9.50.1 Where students are in Video Conference or other conference links with staff from other OSGUK Campuses there will be written assurance from the teacher's employing Campus that all vetting checks, including DBS, have been carried out and these staff will be added to this school's SCR.

9.51 IMAGES AND PHOTOGRAPHY

9.51.1 The Campus ICT and E-Safety Policy and procedures will be followed. In summary the Campus will:

9.51.1.1 use only the student's first name with an image

9.51.1.2 ensure that students are appropriately dressed

9.51.1.3 encourage students to tell if they are worried about any photographs that are being taken of them.

9.51.2 It would be normal practice to demonstrate Campus life by way of photographs and video. If teachers, staff, Trustees or members of the Local Governing Board (LGB) or visitors have any concerns about themselves being in photographs associated with the school they should bring that to the attention of the Campus Principal.

9.51.3 Volunteers acting as such within the school day must also ensure they understand and adhere to the Campus approach to the taking of photographs. It would not be acceptable for a member of teaching staff to be taking photographs of children on any personal devices, and the same standards are expected of volunteers.

9.51.4 It is not acceptable for staff, volunteers or Trustees to post photographs of children, taken within the context of the school, on social media. Photographs of your own children shared on a one-to-one basis via a medium such as 'What's App' would be acceptable.

9.51.5 A common-sense approach to the taking, sharing and posting of photographs of children whilst at school by their family and friends is requested. An appreciation of the risks is important. It is not acceptable for family and friends to take photographs for

anything other than personal use. Any abuse of this approach will mean the circumstances being reviewed and may result in more restrictive measures in school.

9.52 VISITORS TO THE CAMPUS

9.52.1 The Campus will ensure that it complies with the Prevent Duty which requires schools to verify the suitability of all visiting speakers (e.g. internet searches). Schools do not have the power to request DBS checks and barred list checks for visitors, and KCSIE requires Head Teachers and principals to use their professional judgment about the need to escort or supervise visitors.

9.53 SITE SECURITY

9.53.1 The Campus Security & Visitor Policy and procedures will be followed. Visitors to the Campus are asked to sign in and are given a badge, which confirms they have permission to be on site. Red lanyards denote a lack of appropriate checks for the role they are performing at campus, and those individuals must be accompanied at all times i.e. contractors. Green lanyards denote those who are security cleared such as staff.

9.53.2 OneSchool Global Head Office staff will wear identification badges in the same green and red colours, which have the same meaning. The Campus Principal may contact the OSG UK Head Office at any time to verify the credentials of a visitor from the Head Office

9.53.3 All visitors are expected to observe the Campus' safeguarding and health and safety requirements to ensure children in Campus are kept safe.

9.53.4 The Campus Principal will ensure supervision is in place for any visitor that does not have the appropriate checks

9.53.5 The Campus will comply with the CCTV Policy in line with the GDPR 2018 and supporting policy.

9.54 USE OF CAMPUS PREMISES FOR NON SCHOOL ACTIVITIES

9.54.1 Where a campus hires out or rents out facilities or premises to organisations or individuals, it is the responsibility of the Campus Principal and CA team to ensure that appropriate arrangements are in place to keep children safe.

9.54.2 When the services or activities are provided by the proprietor under the direct supervision or management of the campus staff, the campuses child protection arrangements will apply.

9.54.3 Where services or activities are provided separately by another body this will not be the case. The proprietor must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place. (This includes inspecting these as needed) Also to ensure that there are arrangements in place to liaise with the campus on these matters where appropriate.

9.54.4 The proprietor will also ensure that safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises, and failure to comply with this will lead to termination of the agreement.

9.55 ELECTIVE HOME EDUCATION

- 9.55.1 Where a parent/carer expresses their intention to remove a child from school with a view to educate at home, the school must work with other key professionals involved to coordinate a meeting with parents/carers, ideally before a final decision is made. The aim of this meeting is to ensure that parents/carers have considered what is in the best interests of the child/children. This is particularly important where a child has ALN, is vulnerable, and/or has a social worker.
- 9.55.2 Schools will be familiar with the Welsh Government guidance for local authorities on Elective Home Education [Elective home education | Sub-topic | GOV.WALES](#)
- 9.55.3 The school must inform the Local Authority of all deletions from their admissions register when a child is taken off roll, in accordance with the Education (Pupil Registration) (Wales) Regulations 2010.

10. GUIDELINES

10.1 Online documents:

10.2 Handling Allegations against staff and adults [Handling allegations of abuse against teachers and staff | GOV.WALES](#)

10.3 Keeping Learners Safe [Keeping learners safe | GOV.WALES](#)

10.4 All Wales practice Guides:

10.4.1 [Safeguarding Children from Child Criminal Exploitation \(CCE\)](#)

10.4.2 [Safeguarding children from abuse related to cultural and religious beliefs](#)

10.4.3 [Safeguarding children who may be trafficked](#)

10.4.4 [Safeguarding children affected by domestic abuse](#)

10.4.5 [Safeguarding children from child neglect](#)

10.4.6 [Safeguarding children from online abuse](#)

10.4.7 [Safeguarding children where there are concerns about harmful sexual behaviour](#)

10.4.8 [Safeguarding children who are home educated](#)

10.4.9 [Safeguarding children who go missing from home or care](#)

10.4.10 [Safeguarding children from child sexual exploitation](#) (CSE)

10.4.11 [Safeguarding children in relation to the Children \(Abolition of Defence of Reasonable Punishment\) \(Wales\) Act 2020](#)

10.4.12 [Safeguarding children from radicalisation](#)

10.4.13 Prevent Duty Guidance: For England and Wales
<https://www.gov.uk/government/publications/prevent-duty-guidance>

10.4.14 The Use of Social Media for Online Radicalisation

<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>

10.4.15 Keeping Children Safe in Education (KCSIE) [Keeping children safe in education 2025](#)

11. LEGISLATION

11.1 Social Services and Well-being (Wales) Act 2014

11.2 Well-being of Future Generations (Wales) Act 2015

11.3 Rights of Children and Young Persons (Wales) Measure 2011 which encompasses the United Nations Convention on the Rights of the Child.

11.4 Human Rights Act 1998

11.5 Equality Act 2010

11.6 Modern Slavery Act 2015

11.7 Violence Against Women and Sexual Violence (Wales) Act 2015

11.8 Counter Terrorism and Security Act 2015

11.9 Additional Learning Needs and Education Tribunal (Wales) Act 2018.

11.10 Keeping Learners Safe 2022

11.11 Keeping Children Safe in Education 2024

11.12 Children and Families Act 2014

11.13 Childcare Act 2006

11.14 Counter-Terrorism and Security Act 2015

11.15 Protection of Freedoms Act 2012

11.16 Education Act 2011

11.17 Children and Young Persons Act 2008

11.18 Education and Inspections Act 2006

11.19 Safeguarding Vulnerable Groups Act 2006

11.20 The Independent School Standards (Wales) Regulations 2024

11.21 GDPR 2018

11.22 Children Act 1989

12. GUIDANCE BOTH STATUTORY AND NON-STATUTORY

12.1 Child Sexual Exploitation; definition and guide for practitioners - Feb 2017

- 12.2 Contextual safeguarding – University of Bedfordshire – 2018
- 12.3 Data protection: toolkit for schools 2018
- 12.4 Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers - July 2018
- 12.5 Mental health and behaviour in schools 2018
- 12.6 Prevent Duty Guidance: for England and Wales December 2023
- 12.7 Relationships education, relationships and sex education (RSE) and health education 2020
- 12.8 Safeguarding children in whom illness is fabricated or induced – 2008
- 12.9 Sexual harassment between children May 2018
- 12.10 School security advice – 2012
- 12.11 UKCCIS (2016) Sexting in Schools and Colleges' - Responding to incidents and safeguarding young people'
- 12.12 Use of force within schools – July 2013
- 12.13 What to do if you're worried a child is being abused – Advice for practitioners - March 2015
- 12.14 Working Together to Safeguard Children – December 2023

13. ADDITIONAL GUIDANCE AND INFORMATION

- 13.1 Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018).
- 13.2 NSPCC Website Link: <http://www.nspcc.org.uk/>
- 13.3 NSPCC website link to Preventing Abuse: <http://www.nspcc.org.uk/preventing-abuse/>
- 13.4 CEOPs Thinkuknow programme – Keeping children safe on-line and protecting them from sexual abuse and exploitation. <https://www.thinkuknow.co.uk/Teachers/>
- 13.5 Safenetwork website jointly managed by the NSPCC and Children England
<http://www.safenetwork.org.uk/Pages/default.aspx>

14. ATTACHMENTS

- Appendix 1 Further Information on Signs of Abuse
- Appendix 2 OSGUK Training Strategy
- Appendix 3 Working together to safeguard people
- Appendix 4 DSP/DSL Job Description
- Appendix 5 A – Display Notice - Safeguarding Display Posters

B – Display Notice – Safeguarding Local Arrangements

C – Display Notice – Safeguarding Contacts Posts

Appendix 6 Child-on-child sexual abuse: what to do if a child makes a disclosure Poster

Appendix 7: Prevent Risk assessment

15. VERSION CONTROL

Policy Code	Date	Version No.	Nature of Change
QSC/24	September 2020	8	
	January 2021	9	Removal of EEA checks due to Brexit
	September 2021	10	Who is this guidance for, now clearly states it is also for Senior leadership teams, a section of the CP policy has been added to show the responsibility of SLT's. All staff should read KCSIE/KLS alongside the Sexual violence and sexual harassment advice. Significant new section on low level concerns against adults Significant new section on child-on-child abuse (peer on peer) around sexual violence and harassment Greater emphasis on the board as proprietors Introduced annex A for staff that don't work directly with children to read Online Safety added 4th C (Content, Contact, Conduct, Commerce) Added section about use of school premises for non-school activities Added section on elective home education Added updated UKCIS 2020 guidance Updated DSL Job description added information on information sharing
	September 2022	11	Updated to include updated KLS March 2022 and KCSIE September 2022 Added into contacts DSMHL details Specified the requirement of audit is appendix 3 of KLS

			Added in the RP/AP will undertake an annual review of safeguarding on behalf of the proprietor and report this to the board. Added additional guidance on how to handle allegations against adults
	September 2023	12.0	Updated Safeguarding strategy appendix 2
	January 2024	12.1	Updated Working together to safeguard children to Dec 2023 version Updated PREVENT guidance to the December 2023 version Included Prevent risk assessment as appendix 7
	September 2024	13	Updated KCSIE 2023 to 2024 Training Requirements updated to reflect National safeguarding training, learning and development standards.
	January 2025	13.1	Substantial Changes to the definitions throughout, aligning to Keeping Learners Safe and the Welsh Safeguarding Procedures.
	January 2026	13.2	Updated KCSIE 2024 to 2025

APPENDIX ONE: FURTHER INFORMATION ON SIGNS OF ABUSE

Physical abuse

Physical signs	Behavioural signs
Unexplained bruises and welts on the face, throat, arms buttocks thighs or lower back in unusual patterns or shapes which suggests the use of an instrument Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks Scald marks –immersion burns produce ‘stocking’ or ‘glove’ marks on feet and hands or upward splash marks which may suggest hot water has been thrown over a child Human bite marks Broken bones	Behavioural extremes (withdrawal, aggression or depression) Unbelievable or inconsistent explanations of injuries Fear of parents being contacted Flinching when approached or touched Truancy or running away from home

Emotional abuse

Physical signs	Behavioural signs
Eating disorders, including obesity or anorexia Speech disorders (stammering) Nervous disorders (rashes, hives, facial tics, stomach aches)	Fear of parent being approached Fear of making mistakes Developmental delay in terms of emotional progress Cruel behaviour towards children, adults or animals Self-harm Behavioural extremes, such as overly compliant-demanding, withdrawn-aggressive, listless-excitabile

Sexual abuse

Physical signs	Behavioural signs
Torn, stained or bloody underclothes Pain or itching in genital area Bruises or bleeding near genital area or anus Sexually transmitted infections Pregnancy Discomfort when walking or sitting down	Self-harm Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level Sudden or unexplained changes in behaviour Avoidance of undressing or wearing extra layers of clothing Truancy Regressive behaviours (bed-wetting or fear of dark)

Neglect

Physical signs	Behavioural signs
Height and weight significantly below age level Poor hygiene (lice, body odour etc) Inappropriate clothing for weather conditions Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) Constant hunger, sometimes stealing food from others	Erratic attendance at school Chronic hunger or tiredness Having few friends Assuming adult responsibilities

Financial abuse

Physical signs	Behavioural signs
Height and weight significantly below age level Poor hygiene (lice, body odour etc) Inappropriate clothing for weather conditions Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) Constant hunger, sometimes stealing food from others	Erratic attendance at school Chronic hunger or tiredness Having few friends Assuming adult responsibilities

Child sexual exploitation

Physical signs	Behavioural signs
Tiredness or mood swings Bruising Sexually transmitted diseases Pregnancy	Sudden decline in school performance, punctuality, attendance In possession of expensive goods Going to place they cannot afford Age-inappropriate clothing Inappropriate sexualised behaviour Secretive Mixing with older people Misuse of drugs and alcohol

Child criminal exploitation and county lines

Physical signs	Behavioural signs
See sections on physical and sexual abuse Carrying weapons	Self-harming Persistently going missing from school or home and/or being found out of area Unexplained acquisition of money, clothes or mobile phones Excessive receipt of texts/phone calls and/or having multiple handsets Relationships with controlling older individuals or groups Significant decline in school performance Gang association or isolation from peers or social networks

Female genital mutilation

Physical signs	Behavioural signs
Difficulty walking, sitting or standing Bladder or menstrual problems Severe pain and bleeding Infections such as tetanus, HIV and hepatitis B and C	Abroad for a prolonged period Unusual behaviour after a period of absence May talk of a 'special procedure' or 'special occasion to become a woman' Spending longer periods in the bathroom Reluctance to undergo normal medical examinations

Forced marriage

Physical signs	Behavioural signs
Cut or shaved hair as a form of punishment for being disobedient	Absence from School Failure to return from visit to country of origin Self-harm or attempted suicide Running away from home Early marriage of siblings Sudden announcement of engagement to a stranger May talk of a 'special procedure' or 'special occasion to become a woman' Spending longer periods in the bathroom Reluctance to undergo normal medical examinations

Grooming

Physical signs	Behavioural signs
See section on sexual abuse	Spending increasingly prolonged time online Having older boyfriends or girlfriends Secretiveness about who they are talking to online and what sites they visit Possession of electronic devices such as mobile phones or webcams that parents have not provided Engaging less with their usual friends Using sexual language that you would not expect them to know Going to unusual places to meet people Using drugs and/or alcohol Going missing from home or school

Radicalisation

Physical signs	Behavioural signs
out of character changes in dress, behaviour and peer relationships	Showing sympathy for extremist causes Glorifying violence Evidence of possessing illegal or extremist literature A sudden disrespectful attitude towards others Increased secretiveness, especially in relation to internet use Unwillingness or inability to discuss their views Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League

Broad government guidance on the following is also available via the GOV.UK website

- [bullying including cyberbullying](#)
- [children missing education](#)
- [child missing from home or care](#)
- [child sexual exploitation](#)
- [domestic violence](#)

- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [hate](#)
- [mental health](#)
- [missing children and adults](#)
- [private fostering](#)
- [preventing radicalisation](#)
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)

APPENDIX TWO: ONESCHOOL GLOBAL UK TRAINING STRATEGY

1. INTRODUCTION

1.1 The OneSchool Global UK (OSG UK) Safeguarding Statement is:

“We will do all we can to offer the safest place for children to learn, become life-ready, and reach their full potential in society”

1.2. The OSG UK Safeguarding Strategy provides a framework in which we will organisationally approach safeguarding. In order to deliver effective safeguarding practice, it is recognised that all our staff, trustees and volunteers need to have up-to-date role specific training and awareness. There is a need for annual updates and refresher training not only because guidance suggests that is necessary but more importantly the outcome is a stronger safeguarding practice.

1.3. OSG UK supports the standards and the premise that by organisations and agencies working together, children can be effectively safeguarded. This is most effective when there is:

- A shared understanding of roles and responsibilities
- Improved communication between professionals and those working with children
- Effective working together based on sound working relationships
- Improved assessment and decision making

1.4. In order to support effective multi-agency working, OSG UK recognises and endorses that key training is delivered at a local level via a Local Authority (LA). This is particularly relevant for Designated Safeguarding Leads (DSL), Campus Principals and Safeguarding CAs.

2. NATIONAL SAFEGUARDING TRAINING, LEARNING AND DEVELOPMENT STANDARDS WALES

2.1 The National Safeguarding Training, Learning and Development Standards were created to ensure that everyone in Wales gets consistent and good quality safeguarding learning and development.

2.2 Having these standards:

- gives assurance to organisations that all practitioners and volunteers have the same level of learning and development when moving from one organisation to another in Wales.
- improves multi-agency learning and development.
- provides a common language and encourages organisations and practitioners to work together.
- helps organisations and commissioners make sure organisations are complying with the standards.

2.3 The standards refer to some role examples, but do not identify all roles and responsibilities across the sector. It is incumbent, therefore, on the organisation to identify within their own workforce which roles fit into the specific groups.

2.4 When determining appropriate training, learning and development for each individual member of staff, the organisation will need to satisfy itself which group each staff member will fit into.

2.5 If the Campus Principal is unsure of which group is the appropriate one, and the role may straddle more than one group, the expectation is that the staff member will be trained up to the higher group. For example, if a worker straddles group B and C, then they should be trained at group C level.

2.6 Throughout the standards, any staff member commencing in a new role from group B onwards, it is expected that they will have completed training, learning and development in the previous groups prior to commencement in role.

2.7 If not, they should be supported to complete the training, learning and development within the first six months of their induction period or within a timeframe agreed with the Campus Principal, Regional Principal or Regional Director of Safeguarding.

2.8 In groups C to E there is an expectation that practitioners will undertake both generic and role specific training, learning and development. The generic section will include training, learning and development that all practitioners in these groups will need to complete regardless of role or organisation.

2.9 The purpose of these standards is to make sure everyone in Wales gets consistent and good quality training, learning and development that's relevant to their role and responsibilities, and that we, as practitioners, can safeguard people to the best of our ability.

If a practitioner sits in:

- Group A – this is for everyone. They need to have a basic level of awareness of safeguarding and know how to report a concern.
- Group B – this is for people who work directly with people. They should have a higher knowledge of safeguarding, know who to talk to if they notice something is wrong and how to report a concern.
- Group C – this is for people who work directly with people and have particular safeguarding responsibilities. They need to be able to respond to safeguarding concerns.

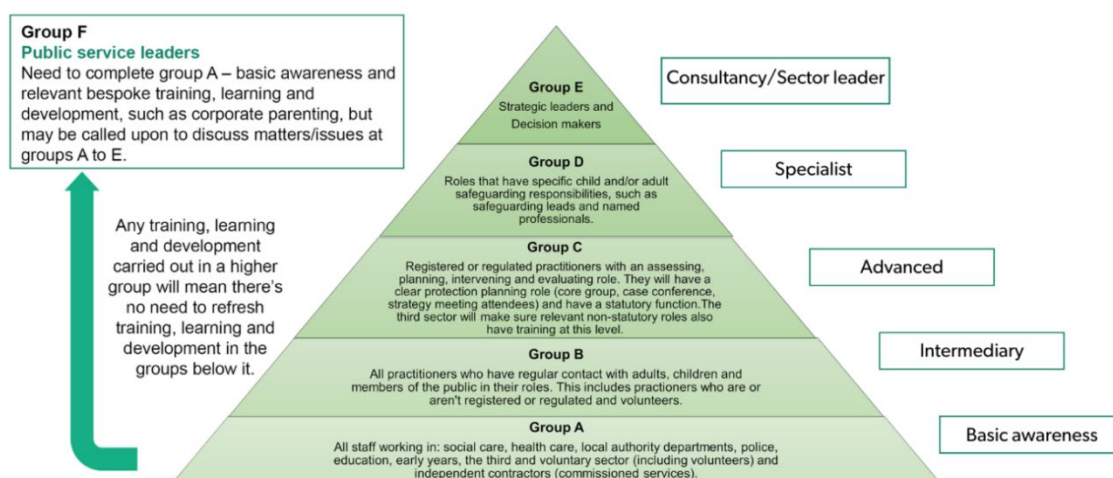
The other groups are:

- Group D – this is mainly for statutory agencies with higher-level decision-making powers.
- Group E – this mainly consists of social services personnel in strategic leadership roles, along with their key statutory partners.
- Group F – this includes all public sector leaders.

2.10 All staff, and volunteers are expected to complete Group A training, this is an online course and should be completed prior to working in any role.

2.11 All members of staff will complete Group B training.

2.12 All members of the safeguarding team; Designated Safeguarding person, including any deputies, the Campus Principal and the Safeguarding Lead CA will complete Group C training.



2.13 Refresher training, learning and development

2.13.1 When practitioners have completed the training, learning and development required for the standards that link to their role, they will continue their safeguarding refresher training, learning and development in line with their role and responsibilities for that group.

2.13.2 For example, a group C practitioner who has completed their core training, learning and development will consider refresher training, learning and development in areas such as child sexual exploitation, Prevent and Deprivation of Liberty Safeguards. They will not be expected to repeat training, learning and development related to groups A and B unless their organisation requires them to do so.

3. THE SUITE OF TRAINING OPTIONS

3.1 OSG UK will support a range of training and awareness options including:

- Online training, currently provided by Flick Learning for OSG UK
- Face-to-face training through a relevant LA
- Bespoke one-off training to address a particular need or issue. There are a number of providers that supply child protection training, i.e. the NSPCC
- Annual updates for all staff/trustees/volunteers delivered by the DSL as part of their role and responsibility.

3.2 When undertaking initial or refresher training it is important to consider the 5 Rs to ensure that awareness and delivery fulfils the necessary aspects required from training:

- a) Recognising child abuse
- b) Responding to children

- c) Reporting concerns – about adults and children
- d) Recording information
- e) Making Referrals to Children's Services

3.3 Who Requires Training?

3.3.1 In effect it is all those who work with children directly or indirectly whether on a paid or voluntary basis. Training should be targeted at the following groups:

- Those with particular and specialised responsibility for safeguarding children such as designated or named professionals, those undertaking Section 47 enquiries or working with complex cases. This is likely to be our DSL cohort, Campus Principals and Safeguarding Trustees/CAs.
- Those who work regularly with children and young people who may be asked to contribute to assessments of children in need. These are predominately our teaching staff.
- Those with some contact with children and young people. These may be people who operate in an environment where they see children but do not have case responsibility for them. This is going to be the majority of our staff either on a paid or voluntary basis.

4. TRAINING FREQUENCY

4.1. Keeping Children Safe in Education (KCSIE) recommends that in a school the Designated Safeguarding Lead (DSL) and any deputies undergo refresher training, to provide them with the knowledge and skills required to carry out the role every two years. This is best completed through the Local Authority. OSG UK supports this approach.

4.2. All staff should undergo safeguarding and Child Protection (CP) training at induction with an expectation that learning and professional development in this area continues through e-learning over the next three months.

4.3. All staff should receive regular safeguarding and child protection updates as required. For OSG UK the focal point in any given campus should be the DSL who should do regular updates at Inset days at least annually. This will be supported by email updates, bulletins etc. from the National Support Office (NSO), LA, NSPCC etc.

5. SPECIFIC TRAINING/AWARENESS REQUIREMENTS

5.1. Nothing within this strategy prevents bespoke training based on need either at a local or national level. Training must always be considered within the context of the overall added value, cost and impact on the workplace.

5.2. Whilst training will be consistent with the requirements of KCSIE the suggested framework for training to role is:

5.2.1 Campus Principals

To include the Behaviour Policy (BP) to ensure that there is no tension between ALN and safeguarding practice. In practice this will be delivered by a Regional Principal and Lead Campus Administrator (LCA).

- a) Induction to include campus approach to safeguarding as well as values and ethos.
- b) Safer Recruitment – Via FLICK
- c) Flick Online Safeguarding Level 2
- d) Annual update/awareness via the DSL
- e) DSL Training via the LA
- f) National Safeguarding Training, Learning and Development Standards Wales Group A, B & C
- g) Read and understood KCSIE Guidance and the Campus CP Policy
- h) Flick Online Prevention of Radicalisation Training
- i) Flick Online Health and Safety for Managers Training
- j) Flick Online Fire Safety for Managers
- k) Flick Online Child Sexual Exploitation Training
- l) Flick Online Domestic Abuse Training
- m) Flick Online Data Protection Training
- n) Flick Online Mental Health and Young People Training
- o) Flick Online Modern Slavery & Trafficking Training
- p) Flick Online Information Security Training
- q) Flick Online Listening Skills Training
- r) Flick Online Lone Worker for Managers Training
- s) Flick Online Forced Marriage Training
- t) Flick Online Female Genital Mutilation Training
- u) Flick Equality and Diversity for Managers Training

5.2.2 Designated Safeguarding Leads

- a) Induction to include campus approach to safeguarding as well as values and ethos. To include the Behaviour Policy to ensure that there is no tension between ALN and safeguarding practice
- b) Flick Online Child Safeguarding Level 2
- c) Safer Recruitment – Via FLICK
- d) E-safety through Via FLICK
- e) DSL training via the LA

- f) National Safeguarding Training, Learning and Development Standards Wales Group A, B & C
- g) Read and understood KCSIE Guidance and the Campus CP Policy
- h) Flick Online Health and Safety Training
- i) Flick Online Child Sexual Exploitation Training
- j) Flick Online Domestic Abuse Training
- k) Flick Online Equality and Diversity Training
- l) Flick Online Female Genital Mutilation Training
- m) Flick Online Fire Safety Training
- n) Flick Online Forced Marriage Awareness Training
- o) Flick Online Information Security Training
- p) Flick Online Modern Slavery and Human Trafficking Training
- q) Flick Online Data Protection Training
- r) Flick Online Listening Skills Training
- s) Flick Mental Health and Young People Training
- t) Flick Prevent of Radicalisation Training
- u) Flick Lone Worker Training

5.2.3 **Newly Qualified Teachers (NQT)**

- a) Induction to include campus approach to safeguarding as well as values and ethos. To include the Behaviour Policy to ensure that there is no tension between ALN and safeguarding practice
- b) National Safeguarding Training, Learning and Development Standards Wales Group A & B
- c) Flick Online Child Safeguarding Level 1
- d) Flick Online E-safety Training
- e) Flick Online Prevent of Radicalisation Training
- f) Read and understood KCSIE Guidance and the Campus CP Policy
- g) Flick Online Health and Safety Training
- h) Flick Online Child Sexual Exploitation Training
- i) Flick Online Domestic Abuse Training
- j) Flick Mental Health and Young People Training
- k) Flick Online Data Protection Training
- l) Flick Online Equality and Diversity Training

- m) Flick Online Fire Safety Training
- n) Flick Online Information Security Training
- o) Flick Online Listening Skills Training
- p) Flick Lone Worker Training
- q) Flick Safe Lifting of Children Training (*if required for role*)

5.2.4 **Teaching Staff**

- a) Induction to include campus approach to safeguarding as well as values and ethos. To include the Behaviour Policy to ensure that there is no tension between ALN and safeguarding practice
- b) National Safeguarding Training, Learning and Development Standards Wales Group A & B
- c) Flick Online Child Safeguarding Level 1
- d) Flick Online E-safety Training
- e) Annual update/awareness via the DSL
- f) Flick Online Prevent of Radicalisation Training
- g) Read and understood KCSIE Guidance and the Campus CP Policy
- h) Flick Online Health and Safety Training
- i) Flick Online Child Sexual Exploitation Training
- j) Flick Online Data Protection Training
- k) Flick Online Domestic Abuse Training
- l) Flick Online Equality and Diversity Training
- m) Flick Online Information Security Training
- n) Flick Online Listening Skills Training
- o) Flick Lone Worker Training
- p) Flick Mental Health and Young People Training
- q) Flick Safe Lifting of Children Training (*if required for role*)

5.2.5 **Paid Staff (Agency)**

- a) Induction to include campus approach to safeguarding as well as values and ethos. To include the Behaviour Policy to ensure that there is no tension between ALN and safeguarding practice
- b) National Safeguarding Training, Learning and Development Standards Wales Group A & B

- c) Flick Online Data Protection Training (*completed by long term agency staff*)
- d) Flick Online E-safety Training (*completed by long term agency staff*)
- e) Annual update/awareness via the DSL
- f) Flick Online Prevent of Radicalisation Training (*completed by long term agency staff*)
- g) Read and understood KCSIE (Part 1) and the Campus CP Policy
- h) Flick Online Health and Safety Training (*completed by long term agency staff*)
- i) Flick Online Child Sexual Exploitation Training (*completed by long term agency staff*)
- j) Flick Online Domestic Abuse Training (*completed by long term agency staff*)
- k) Flick Mental Health and Young People Training (*completed by long term agency staff*)

5.2.6 **Volunteers**

- a) Induction to include campus approach to safeguarding. To include the behaviour policy to ensure that there is no tension between ALN and safeguarding practice. DSL led.
- b) National Safeguarding Training, Learning and Development Standards Wales Group A & B
- c) Annual Safeguarding Training and Safeguarding Quiz to demonstrate understanding
- d) Read and understood Keeping Learners Safe, KCSIE (Part 1) and the Campus Safeguarding and Child Protection Policy
- e) Flick Online Prevent of Radicalisation Training (*for SDMs only*)
- f) Flick Online E Safety (For SDM's Only)

5.2.7 **Safeguarding CA**

- a) Induction to include campus approach to safeguarding. To include the behaviour policy to ensure that there is no tension between ALN and safeguarding practice. Campus Principal led.
- b) DSL Training via the LA
- c) National Safeguarding Training, Learning and Development Standards Wales Group A, B & C
- d) Flick Online Prevent of Radicalisation Training
- e) Read and understood KCSIE Guidance and the Campus CP Policy
- f) Annual update/awareness by the DSL
- g) Flick Online Information Security Training

- h) Flick Online Equality and Diversity Training
- i) Safer Recruitment – Via FLICK Online
- j) Flick Online Data Protection Training
- k) Flick E Safety

5.2.8 **CA Team**

- a) Induction to include campus approach to safeguarding. To include the Behaviour Policy to ensure that there is no tension between ALN and safeguarding practice
- b) Safer-recruitment – Via Flick Online
- c) National Safeguarding Training, Learning and Development Standards Wales Group A & B
- d) Annual update/awareness via the DSL
- e) Read and understood KCSIE Guidance and the Campus CP Policy
- f) Flick Online Equality and Diversity Training
- g) Flick Online Health and Safety for Managers Training (*For H&S CA only*)
- h) Flick Online Fire Safety for Managers Training (*For H&S CA only*)
- i) Flick Online Data Protection Training
- j) Flick Online Information Security Training
- k) Flick Online Prevent of Radicalisation Training
- l) Safer Recruitment – Via FLICK
- m) Flick E Safety

6. RECORD KEEPING

6.1. It is important that the campus maintains a singular log of training/awareness undertaken by all staff including trustees and volunteers. This allows for a clear picture of the training landscape, which will help identify local need and ensure timeliness of refresher training.

6.2. This log is separate from any attendance record taken at the time for a singular event.

6.3. One advantage of using Flick is that a central training record is maintained for all those who have used this online tool. It is for campuses to ensure that a member of staff has administration access rights to Flick in order to monitor individual school take-up.

6.4. It would be beneficial if the DSL maintained a separate record of any communication or update sent during the course of the year either internally or to the wider school family. This will be particularly helpful for evidencing the whole school approach during any subsequent inspection.

APPENDIX THREE: JOB DESCRIPTION AND PERSON SPECIFICATION (2023)

JOB DESCRIPTION

Designated Safeguarding Lead (DSP)/Deputy Designated Safeguarding Lead (DDSP)

PURPOSE

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the campus leadership team, is appointed to the role of Designated Safeguarding Lead.

The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection (including online safety).

This should be explicit in the role holder's job description. This appendix will be printed and signed by the DSP and DDSPs to go in their personnel file.

The Designated Safeguarding Lead should have the appropriate status and authority within the campus to carry out the duties of the post.

The role of the Designated Safeguarding Lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively.

Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

Deputy Designated Safeguarding Leads

The school will ensure there is a minimum of one Deputy DSP.

All deputies should be trained to the same standard as the Designated Safeguarding Lead and the role should be explicit in their job description.

The same job description will apply to Deputies as well as DSPs.

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the Designated Safeguarding Lead, this lead responsibility should not be delegated.

DUTIES

Availability

During term time the Designated Safeguarding Lead (or a deputy) should always be available (during school hours 8am – 4pm) for staff in the school to discuss any safeguarding concerns.

Whilst generally speaking the Designated Safeguarding Lead (or deputy) would be expected to be available in person, or via their OSG provided mobile.

Manage referrals

The Designated Safeguarding Lead is expected to refer cases:

- of suspected abuse and neglect to the local authority Children's Services as required and support staff who make referrals to local authority Children's Services.
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme.

- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - [When to Call the Police](#) should help understand when to consider calling the police and what to expect when working with the police.

Working With Others

The Designated Safeguarding Lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- This should include being aware of the requirement for children to have an Appropriate Adult.
- Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the “case manager” (as per Part four of KCSIE) and the local authority designated officer(s) (DO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and additional learning needs coordinators (ALNCO's), or the named person with oversight for ALN in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.
- This includes:
- ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory intervention has ended, there is still a lasting impact on children's educational outcomes.

Raising Awareness

The Designated Safeguarding Lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and

- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge, and skills

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role.

This training should be updated at least every two years and should take place with the regional safeguarding boards

The Designated Safeguarding Lead (and any deputies) should undertake Prevent awareness training every two years

Training should provide Designated Safeguarding Leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority Children's Services, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority Children's Services referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the Designated Safeguarding Lead has in providing information and support to local children's services in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with additional learning needs and disabilities (ALN), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the campus, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the campus with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with additional learning needs and disabilities (ALN) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with staying safe online
- obtain access to resources and attend any relevant or refresher training courses, and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the campus may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other Designated Safeguarding Leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing Support to Staff

Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

ensure that staff are supported during the referrals processes, and

support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, Designated Safeguarding Leads (and deputies) should be supported in developing knowledge and skills to: encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the campus may put in place to protect them, and, understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE, and therefore the Designated Safeguarding Lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Information sharing and managing the child protection file

The Designated Safeguarding Lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.
- They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE.
- Where children leave the campus (including in year transfers) the Designated Safeguarding Lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as Designated Safeguarding Leads and additional learning needs co-ordinators (ALNCO's) or the named person with oversight for ALN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

REPORTING TO

- Reporting to Campus Principal and Regional Director Safeguarding
- Safeguarding CA

SUPPORT FOR THE ROLE

The role is supported on occasion by the RSO and the CP

OneSchool Global UK provides a range of support services in areas such as ICT, recruitment, HR, policies, resources and compliance.

Employee Signature:

Line Manager Signature:

Date:

ISSUED BY

OneSchool Global UK

Issue date: September 2023

PERSON SPECIFICATION

Designated Safeguarding Lead (DSP)/Deputy Designated Safeguarding Lead (DDSP)

Specification	Essential	Desirable
Experience and Knowledge	- Up to date DSP training, dated within 2 years provided by the campuses Local Authority - National Safeguarding Training, Learning and Development Standards Wales Group A, B & C - Member of the Campus Leadership Team	
Education and Qualifications	- Appropriate teaching qualification, or equivalent qualification, appropriate to role in school and to the role of DSP. - Safer Recruitment trained - E-Safety trained, in a course that is recognised by the local safeguarding authority where the school is based - Trained in the PREVENT Duty - Trained in Operation Encompass	
Skills and Abilities	- Good communication skills written and verbal - Good organisational skills - Good record keeping skills - A positive role model of professional practice and conduct of others	

	• Able to communicate with a range of stakeholders with calmness, reflection and professionalism	
Training	• Willingness to undertake relevant training to the role, ongoing, and identify own development needs • Committed to ongoing CPD and Professional development	
Attributes and Attitudes	• Flexible approach and positive attitude towards work • Punctual and reliable • Ability to adapt to changes in the workplace • Ability to remain focused and calm even with dealing with challenging and complex circumstances, some of which will be upsetting • Ability to work as part of a team • Ability to reflect on decisions and next steps, with the premise of 'what if I'm right'	
Equality, diversity and inclusion	• Knowledge, understanding and commitment to equality, diversity and inclusion informed by practical experience and application	
Safeguarding	• Knowledge, understanding and commitment to safeguarding and promoting the welfare of students • Ability to form and maintain appropriate relationships and personal boundaries with students	
The post holder will be required to complete an enhanced Disclosure Barring Service (DBS) Check with appropriate barred list checks, or the equivalent, and must be eligible to work in the UK. OneSchool Global UK is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment. All staff are expected to be committed to the Equal Opportunities Policy.		