Outcomes First Group

SAFEGUARDING POLICY

Falkland House School

Designated Safeguarding Lead: Andrew

Donaldson Safeguarding Governor: Toni Woods

Safeguarding Policy

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Safeguarding is everyone's responsibility

All team members who work directly or indirectly with children and young people in our schools and colleges have a responsibility to safeguard their welfare. The following people have specific additional responsibilities with regard to safeguarding and must work together to ensure a consistent approach across the school:

Designated Safeguarding Lead (DSL): Andrew Donaldson

Deputy Designated Safeguarding Lead (DSL): Ben Gannon, Jon Cluett

Head of Service: Patrick Gannon

Safeguarding Governor: Toni Woods

Terminology - please note that the terms "our teams" and "team member/s" include everyone working with the people in Outcomes First Group's services in a paid or unpaid capacity, including employees, consultants, agency staff and contractors.

1.0 Policy statement

Outcomes First Group is committed to ensuring that all of the children and young people we educate and support are effectively safeguarded at all times. This policy sets out how children and young people in our schools and colleges will be safeguarded; it applies when working offline and online, at the educational setting, on visits and off-site activities, and in all virtual communications.

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

It is essential that everybody working within the Group understands their safeguarding responsibilities.

Where a school or home places a child/young person with an alternative provider, the school or home continues to be responsible for the safeguarding of that child and should be satisfied that the placement meets the child/young person's needs.

Governing bodies and proprietors must ensure that staff who work directly with children are aware of and understand the core requirements of the National Guidance for Child Protection (2021), Getting it Right for Every Child (GIRFEC) and the UN Convention on the Rights of the Child (UNCRC) and the UNCRC (Incorporation) (Scotland) Bill.

The Education (Scotland) Act 1980 defines a child or young person as: a person that is of school age if they have attained the age of five years and have not attained the age of sixteen years and the Children and Young People (Scotland) Act 2014 defines a child as someone who has not yet attained the age of eighteen. As per the National Guidance the Head of Service, in collaboration with other relevant services, will have to decide which legal framework best fits each person's needs and circumstances if they are between the ages of 16 and eighteen.

The 2014 Act also requires all services for children and young people to work together to adapt and streamline their systems and practices to improve how they work together to support children and young people and their families.

All team members working directly or indirectly with children and young people **must** ensure that:

- Children and young people feel safe and that they are listened to;

- they create an environment and culture in which children and young people feel valued;
- the best interests of the child or young person are always considered and acted upon;
- safer recruitment procedures (set out in our *Safer Recruitment Policy*) are rigorously followed;
- they understand their roles and responsibilities in keeping children and young people safe through ongoing learning, development and supervision;
- they understand that children and young people with special educational needs or disabilities (SEND), certain medical or physical health conditions can face additional safeguarding challenges both online and offline;
- they are vigilant in monitoring possible signs of abuse, neglect or exploitation including for those pupils/students who have complex learning difficulties or communication needs, who may be particularly vulnerable;
- they are aware that children and young people can abuse other children and young people i.e. child-on-child abuse).
- they maintain an attitude of **'it could happen here'**;
- they follow the appropriate procedures in place for sharing safeguarding concerns, including low-level concerns, and that these are shared with relevant professionals in a timely manner;
- they understand and implement local safeguarding procedures as set out in local authority arrangements;
- pupils and students learn about appropriate relationships with adults and their peers and recognise when other people's behaviour is unacceptable or inappropriate.
- There is a zero-tolerance approach to harassment, violence, abuse, inappropriate behaviour and bullying of any kind are not acceptable and will not be tolerated.

2.0 Local Arrangements for the school

2.1 All team members must be aware of the local arrangements for safeguarding relevant to the school in which they work;

2.2 The local arrangements for Falkland House School are as follows:

2.3 Falkland House School safeguarding arrangements are in line with local Child Protection arrangements, as per the Fife Council Child Protection Committee (CPC) Child protection | Fife Council. The Fife Council safeguarding partnership consists of the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police force in the local authority area).

2.4 The Scottish Social Services Council (SSSC) regulates people in social care. Allegations against staff that meet the SSSC threshold must be reported to SSSC immediately. Please see: Guidance for making a referral Address: Compass House, 11 Riverside Drive, Dundee 4NY Tel: 0345 60 30 891 Email: employerlink@sssc.uk.com The Care Inspectorate must be notified immediately if an allegation against a staff member is of abuse of a service user or within 24 hours of an allegation of misconduct by the provider or any persons employed in care services.

2.5 All safeguarding referrals for young people placed by the local authority this must be reported to the local Social Work Contact Centre on 03451 551503 or email sw.enquiries@fife.gov.uk. Out of office hours (9am to 5pm) the Emergency Social Work number is 03451 550099. Referrals for children and young people under 16 will be dealt with under the Children's safeguarding arrangements and those over 18 will be dealt with under the Adult's safeguarding arrangements. For those aged between 16 and 18, as per the National Guidance, the Head of Service, in collaboration with other relevant services, will have to decide which legal framework best fits each person's needs and circumstances. For any safeguarding referrals for young people placed by an authority out with Fife, you must follow the placing authorities safeguarding team. Should the placing authority require a CP investigation to take place they can contact fife social work to undertake this on their behalf, this request needs to come from placing social work.

2.6 The local authority safeguarding referral procedure is if you consider a child or young person to be in IMMEDIATE danger then call Police Scotland on 999. For non-emergency calls, you can call Police Scotland on 101 or the Social Work Contact Centre on 03451 551503 or email sw.enquiries@fife.gov.uk Out of office hours (9am to 5pm) the Emergency Social Work number is 03451 550099.

2.7 For all referrals regarding human trafficking and exploitation follow the National Referral Mechanism (NRM) for First Responders in Scotland. Single Competent Authority Operates the National Referral Mechanism (NRM) Telephone 028 90 191049 (operates 10am to 4pm Mon-Fri) NRMSNI@homeoffice.gov.uk Police Scotland Telephone 999 in Emergency Telephone 101 for any immediate intelligence or urgent safeguarding needs. Police Scotland National Human Trafficking Unit scdnationalhumantraffickingunit@scotland.pnn.police.uk

2.8 You may be in a position to identify and support someone who is vulnerable to becoming involved in extremism or terrorism. You can read about some of the signs on the Lets Talk About It website. There is no single type of person likely to become involved in terrorism or extremism and the process of radicalisation is different for every individual. Signs that someone is being recruited into extremism are numerous.

You can report your concerns in one of these ways:

- contact Police Scotland by dialling 101
- contact fife council
- report your concerns anonymously to CrimeStoppers: 0800 555 111
- call the Anti-Terrorist Hotline: 0800 789 321
- if it is an emergency - always dial 999

2.9 The local authority procedure for an early help is referral is calling between 8.45 am and 5.00 pm by phone on 03451551503 or by email at Social Work - Contact Us | Fife Council. The number 03451551503 be used out with these hours to connect to the out-of-hours social work service

2.10 The Chair of Governors for insert name of school is: Toni Woods

2.11 The Group's Director of Safeguarding/Safeguarding Adviser can be contacted at: safeguarding@ofgl.co.uk

3.0 What is safeguarding and child protection?

3.1 Safeguarding

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

What do we mean by Child Protection and Safeguarding?

Child Protection - The processes involved in consideration, assessment and planning of required action, together with the actions themselves, where there are concerns that a child may be at risk of harm from abuse, neglect or exploitation.

Safeguarding - This is a much wider concept than child protection and refers to promoting the welfare of children, young people and protected adults. It encompasses protecting from maltreatment, preventing impairment of their health or development, ensuring that they are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children, young people and protected adults to have the best outcomes. Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or likely to suffer, significant harm. We have a distinctive approach to safeguarding in Scotland linked to Getting It Right for Every Child (GIRFEC) which promotes action to improve the wellbeing of every child and young person. Safeguarding is a golden thread that runs through the curriculum. The aim is to support the development of learner's knowledge, skills and resilience to keep themselves safe and protected, and to develop an understanding of the world so that they can respond to a range of issues and potential risky situations arising throughout their lives. As such, it permeates many features of the education experience including leadership, values, vision, the curriculum, learning and teaching, positive relationships, building learner resilience and suchlike.

3.2 Contextual Safeguarding

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

3.3 Child Protection

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

3.4 Safeguarding is everyone's responsibility

While local authorities and placing authorities have statutory responsibilities regarding safeguarding, we believe that safeguarding is everyone's responsibility. The Group expects that, without exception, team members keep children and young people at the centre of all that they do and that any actions taken are in the best interests of the child or young person. We also expect that children and young people are listened to, and their voices are always heard.

3.5 Defining Significant Harm/Child Abuse

3.5.1 Children may be vulnerable to neglect, abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including sexual, physical and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should put the needs and best interests of children first when determining what action to take.

The UK Children Act 1989 and parallel legislation Children (Scotland) Act 1995, introduced the concept of 'Significant Harm' as the threshold that justifies compulsory intervention in family life in the best interests of children. The 1995 Act states that:" If inquiries indicate reasonable grounds to believe or suspect that a child is at risk of significant harm the local authority may apply for a court order authorising action to protect or assess the child."

3.5.2 'Harm' means the ill treatment or the impairment of the health or development of the child, including impairment suffered as a result of seeing or hearing the ill treatment of another. In this context, 'development' can mean physical, intellectual, emotional, social or behavioural development and 'health' can mean physical or mental health. Whether the harm suffered, or likely to be suffered, by a child or young person is 'significant' is determined by comparing the child's health and development with what might be reasonably expected of a similar child. (National Guidance for Child Protection in Scotland 2021).

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

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

3.5.4 It is also important to be aware that:

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

3.5.5 Part 5 of the Sexual Offences (Scotland) Act 2009 Part 5 of the Sexual Offences Scotland) Act 2009 covers the abuse of trust offence whereby a person aged 18 or over engages in sexual activity with a person under that age if the person aged 18 or over is in a position of trust in relation to the younger person. The definitions of when a person is in a 'position of trust' would include all staff in schools. All staff must be aware of their responsibilities and boundaries of relationships with pupils and work within the Outcomes First Group's Code of Conduct.

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

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

made immediately. Referrals should follow the local referral process.

4.0 The role of governors, the proprietor and senior managers

4.1 Governing bodies and proprietors have a strategic leadership responsibility for their school's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must read and have regard to the whole National Guidance for Child Protection (2021) guidance document, ensuring policies, procedures and training in their schools are effective and comply with the law at all times. They must have oversight of the safeguarding policies and procedures and ensure that they are being effectively implemented within the school and that training is effective.

As with all team members, Governors must be safely recruited and have all relevant checks on file. Please refer to section 8.0 of this policy and see the Group's *Safer Recruitment Policy* for further information.

4.2 Governing bodies and proprietors should:

- Have a senior board level (or equivalent) lead to take **leadership** responsibility for their schools safeguarding arrangements'. The named Governor for the school is Toni Woods
- Ensure that the school contributes to multi-agency working.
- Be aware of the local multi-agency safeguarding arrangements.
- Receive appropriate safeguarding and child protection (including online safety) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in the school are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- As part of the whole school safeguarding approach, they must create a culture that safeguards and promotes the welfare of children and young people in their setting. This includes ensuring that robust recruitment procedures are in place that deter and prevent people who are unsuitable to work with children and young people from applying for or securing employment, or volunteering opportunities in schools.
- Be responsible for ensuring an appropriate senior team member, from the school Leadership Team, is appointed to the role of Designated Safeguarding Lead (DSL). With the support of governors, proprietors and senior leaders, the DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role-holder's job description.
- Be aware of their obligations under the Human Rights Act 1998 (HRA) and the Equality Act 2010, which require schools to:
- Act in a way that respects and protects an individual's human rights when they make individual decisions about them. In particular, the right to: education, freedom from inhuman and degrading treatment, and respect for private and family life. These rights must be protected and applied without discrimination.
- Carefully consider how children and young people are supported with regard to particular protected characteristics, including disability, sex, sexual orientation, gender reassignment and race. Proportionate positive action can be taken to deal with particular disadvantages affecting children and young people with a protected characteristic to meet their specific need. This includes a duty to make reasonable adjustments for disabled children and young people and those with long term conditions.
- Guidance to help schools understand how to fulfil their duties under the Equality Act 2010 is available on the DFE website: Advice for schools

- Ensure that children and young people are taught about how to keep themselves and others safe, including online. This education should be tailored to the specific needs and vulnerabilities of individual children and young people.
- Do all that they reasonably can to limit children and young people's exposure to online risks from the school's system, including:
- Ensuring the school has appropriate filters and monitoring systems in place, that are informed in part by the risk assessment required by the Prevent Duty, and that their effectiveness is regularly reviewed.
- Work closely with senior leaders, the DSL and IT service providers in all aspects of filtering and monitoring.
- Ensuring that the school Leadership Team and relevant team members have an awareness and understanding of the appropriate online filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Consider the age and developmental age of their children and young people, the number of children and young people and their needs, how often they access the IT system and the proportionality of costs verses safeguarding risks.
- Adhere to the Education Scotland guidance to:
    - identify and assign roles and responsibilities to manage filtering and monitoring systems.
    - review filtering and monitoring provision at least annually.
    - block harmful and inappropriate content without unreasonably impacting teaching and learning.
    - have effective monitoring strategies in place that meet their safeguarding needs
    - Review the standards and discuss with IT and service providers what more needs to be done to support schools and colleges in meeting this standard.

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

4.4 Where the school premises are used for non-school activities and the services or activities are provided under the direct supervision or management of the school, the schools arrangements for child protection and safeguarding apply. Where service or activities are provided by another body, the school must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and ensure they will liaise with the school on these matters as appropriate. This applies regardless of whether or not the children and young people who attend any of these services or activities are pupils or students on the school roll or college roll.

The governing body or proprietor should also ensure safeguarding requirements are included in any lease or hire agreement, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

In the event of an allegation being received relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children. As with any safeguarding allegation, the school should follow the safeguarding procedures set out in this document, including informing the Local Authority where appropriate.

5.0 Designated Safeguarding Lead (DSL)

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

5.2 Head of Service must ensure that job descriptions for the DSL and Deputy DSL are kept on personnel files and clearly state their responsibilities.

5.3 The DSL (or deputy) must always be available during school hours for team members to discuss any concerns.

5.4 The main responsibilities of the Designated Safeguarding Lead (DSL) are to:

- provide support to team members regarding safeguarding concerns
- lead on advising team members of any action to be taken due to a safeguarding concern
- ensure that children and young people are immediately safeguarded from harm and abuse
- ensure that there is appropriate cover during their absence, and that team members know who to approach if the DSL/Safeguarding Lead is unavailable
- liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries
- adopt a child-focused and holistic approach ensuring the children and young people's wishes and feelings are taken into account when determining what action to take
- refer allegations to the Local Authority or local equivalent
- refer safeguarding concerns to placing and host local authorities
- refer suspected cases of radicalisation to Channel
- refer suspected case of Female Genital Mutilation to the police
- refer suspected cases of Child Sexual Exploitation and trafficking to the police
- refer cases to Disclosure Scotland after a team member has been dismissed or there is suspected harm having been caused to a child
- refer relevant allegations to the Scottish Social Services Council (SSSC)
- liaise with the Director of Safeguarding/ Safeguarding Adviser and HR Team if any allegations or suspected harm having been caused to a child by a team member
- ensure that the setting complies with the work of the local safeguarding partnership
- ensure that all team members receive regular update training in relation to safeguarding
- provide safeguarding updates to senior managers and governors
- ensure that there is effective monitoring and oversight of all safeguarding concerns
- promoting the educational achievements of Looked After Children in line with the National Guidance for Child Protection (2021).
- have details of the social worker for any looked after children and the name of the virtual school head in the relevant authority for any children and young people with a social worker or previously looked after.
- Work closely with IT Services and providers to meet the needs of the school/home and requesting system specific training and support as and when required.
- Take lead responsibility for any safeguarding and child protection matters that are picked up through web filtering and monitoring systems in place, (Please see Web Filtering and Monitoring Policy). This includes overseeing and acting on filtering and monitoring reports, safeguarding concerns and checks to the filtering and monitoring systems.
- Investigate any attempted access of inappropriate sites as soon as possible and take appropriate action; and refer appropriately any attempted access of websites related to extremism under Prevent duties and local arrangements for reporting.

5.5 It is important that all team members understand the role of the DSL on their appointment within the school and as part of their induction. The DSL is responsible for ensuring that all team members understand their roles and responsibilities regarding safeguarding children and young people that a child-focused approach is taken. The DSL will assess safeguarding concerns within the context of the child/young person's environments in line with our contextual safeguarding approach.

5.6 The DSL must ensure that clear, concise and good quality documents are kept of all allegations or safeguarding concerns, including low level concerns. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each pupil. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.
- reports about incidents of sexual violence should include the time and location, so action can be taken to make the location safer if required.

If in doubt about recording requirements, team members should discuss with the DSL (or deputy).

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

5.8 When pupils/students leave the school or college, the DSL is responsible for ensuring that the necessary information is shared with the new school or college. It is the DSL's responsibility to ensure that the pupil's child protection file is transferred to the new school or college as quickly as possible and as securely as possible. This should be within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school to have support in place for when the child/young arrives.

Files must be transferred securely; the child protection file should be transferred separately from the main pupil /student file. Confirmation of receipt must be obtained. Schools must inform their Local Authority of all deletions from their admission register when a pupil of compulsory school age is taken off roll.

6.0 Safeguarding Training and Updates for all team members

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

Whilst considering the above training requirements, governing bodies and proprietors should have regard to the Professional Standards for Teachers which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.

Care staff work alongside their Scottish Social Services Council (SSSC) Continued Professional Learning, in keeping with the SSSC code of practice guidance.

6.2 All team members are expected to follow this policy and statutory guidance. Those working in education settings must read and follow this policy in conjunction with the National Guidance for Child Protection (2021).

6.3 All team members must read the following documents:

The setting's:

- Restrictive Physical Intervention Policy
- Behaviour Policy
- Anti-bullying Policy
- Child-on-child abuse Policy and Harmful Sexual Behaviour Guidance
- Child Exploitation Policy
- Protecting Children from Radicalisation policy
- Web Filtering and Monitoring policy
- Mobile and Smart Technology Policy
- Medication Policy
- Description and guidance of the role of the DSL and Deputy/Safeguarding Lead
- Low level concerns Guidance & Procedure

Outcomes First Group's:

- Group Safeguarding Statement
- The Use of Restrictive Practices and Restraint Terms of Reference
- Suspension and Permanent Exclusion Policy
- Safer Recruitment policy
- Data Protection policy
- Staying Safe Online
- Gaming Devices Best Practice Guidance
- Whistle blowing and complaints policy
- Code of Conduct & Ethics Policy
- Photography of Injuries and Medical Conditions Policy
- Serious Incident Escalation Policy
- Educational Visits & Activities Policy
- Alternative Provision Policy
- Work Experience Policy
- Group Supervision Policy

Team members should also be aware of the following Guidance:

- National Guidance for Child Protection (2021)
- Getting it Right for Every Child (GIRFEC)
- Scottish Government Guidance for schools responding to sexual violence
- Scottish Government Children Missing from Education Service Guide

- Scottish Government National Action Plan on Internet Safety for Children and Young People
- Scottish Government Healthy relationships and consent: key messages for young people
- Upstream (Stop It Now! and the Scottish Government)
- What's the problem? (Stop It Now!)
- Revised Prevent Duty Guidance for Scotland - GOV.UK

CSA Centre also provides resources to Help education setting identify and respond to concerns

6.4 The school will provide regular safeguarding updates to staff, either through face-to-face training, meetings or through regular written updates.

All team members must complete the mandatory training:

- Introduction to Safeguarding (e-learning) to be completed within the first week of employment.
- Safeguarding Children Foundation within three months of employment.
- Annual training either through face-to-face training, meetings or through regular written updates by the setting that provides updated statutory information and requirements that all team members must be aware of.

A line manager competency check must be completed annually (via competency check on Shine) in the years in between the formal safeguarding course. If there are any concerns regarding competency or knowledge the team member will be referred to complete a refresher or original safeguarding course.

DSLs (and their deputies) must refresh their advanced training **at least every two years.**

If a service has a specific need or issue in relation to Safeguarding, then they can request a closed virtual or closed face-to-face course to support with the need. Contact details for school's Regional Training Manager can be found on Engage.

6.5 All members of the leadership teams, including the Head of Service (or equivalent)/ Registered Manager and DSL/Safeguarding Lead should also be familiar with the National Guidance for Child Protection (2021).

7.0 Roles and Responsibilities of Team Members

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

7.2 During induction, team members will receive safeguarding training, including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Team members must be familiar and understand the role of the DSL, the local safeguarding partnership and the individual systems relating to safeguarding within the school. Team members must also know, understand and implement the school's behaviour management policy, the Group's Code of Conduct & Ethics and the safeguarding response to pupils and students who are absent from education or are missing from home.

7.3 Team members are responsible for:

- compliance with the Group's policies, statutory guidance and legislation including National Guidance for Child Protection (2021), Getting it Right for Every Child (GIRFEC) and the UN Convention on the Rights of the Child (UNCRC).
- understanding the role of the DSL;
- attending training and meetings;
- helping to develop and deliver a curriculum which helps children and young people to understand about abuse, neglect and exploitation appropriate and safe relationships with adults and other children and young people, and keeping safe both online and offline;
- helping to provide an environment where children and young people feel safe and valued;
- ensuring they fully understand how to report concerns and if not, asking for further training and support;
- understand the safeguarding response to pupils and students absent from school or missing from education;
- listening to pupils and students;
- supporting pupils and students if they disclose safeguarding information;
- ensuring that they are alert to signs of abuse and exploitation by other children, young people and adults and aware of indicators or possible signs of neglect;
- ensuring that they closely monitor any possible signs of abuse and harm for those pupils and students who are unable to communicate verbally or who have complex health and care needs;
- keeping sensitive information confidential and sharing it only with professionals for whom it is relevant;
- helping to identify those pupils and students who may benefit from Early Help;
- helping to implement Child Protection Plans.

7.4 Team members are in a close position to children and young people within schools and colleges and have regular contact with them, so are in the best position to know if a child is behaving in a way which could possibly indicate that they are being hurt or harmed. Any concerns, no matter how small they may seem, must be reported immediately to the DSL both verbally and in writing. **It is the team member's responsibility to ensure that this information is acted upon. They have a duty to follow up with the DSL to ensure that action has been taken.**

7.5 All team members should be aware that a pupil/student may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. Team members must maintain professional curiosity and be alert to changes in a pupil's behaviour. Team members must speak to the DSL if they have any concerns about a pupil. It is also important that team members determine how best to build trusted relationships with pupils/ students to facilitate communication.

7.6 Some common signs team members should be alert to that may indicate something concerning may be happening in a child or young person's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn or seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing

- always choosing to wear clothes which cover their body

(Please see: NSPCC: Spotting the Signs of Child Abuse)

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

For children and young people with special educational needs or disabilities (SEND), and multiple complex co-occurring needs, it can be difficult for team members to distinguish between signs of abuse and behaviour that is part of the child or young person's condition. Team members should be alert to ***changes*** in their behaviour and always consider all possible causes of this. Please also see:

Children with disabilities - Safeguarding our most vulnerable

NSPCC - Safeguarding children with special educational needs and disabilities (SEND)

NSPCC - Safeguarding Deaf and disabled children and young people

7.7 Being Lesbian, gay, bisexual transgender, queer, questioning and/or ace (LGBTQ+) is not in itself an inherent risk factor for harm. However, pupils/students who are LGBTQ+, or are perceived to be LGBTQ+, can be targeted by other children and young people. Risks can be compounded where pupils/students who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that team members endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with team members.

Please note: The DfE refers to 'LGBT' in its in guidance. We have chosen to use the term 'LGBTQ+', because this abbreviation appears to be most inclusive and commonly used by the community.

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

7.9 If the school/ college becomes aware that a child or young person under the age of 18 is subject to a private fostering arrangement, the local authority must be informed so they can assess and support them to ensure it is a safe place for the child. Private foster carers are people who are not a close relative to a child but plan to look after them for 28 days or more. Team members should inform the DSL immediately if they become aware of a private fostering arrangement.

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

The Headteacher, Principal or equivalent and DSL should be familiar with Operation Encompass which enables schools and police to work together to provide emotional and practical help to pupils and students, where police have been called to an incident of domestic abuse in the household.

7.10 The school/college must ensure that pupils know:

- how to report any concerns and feel confident that they will be listened to and supported.
- They can also report any concerns by emailing tellus@ofgl.co.uk, which is monitored by the Quality Team.
- Are aware they can contact the NSPCC dedicated helpline on 0800 136 663 or by emailing help@NSPCC.org.uk
- Are aware of how to contact Childline (0800 1111)

7.11 Team members are not permitted to use personal mobile phone devices, cameras or digital recording devices at any time during operational hours within the school. Team members should be supported to safely store away their personal devices during these times in a lockable personal storage area, with personal keys provided to each team member.

Team members are advised if they wish to take their personal devices out of storage, they are only permitted to do so during their designated break times, with the restriction of only doing so in the designated team members room area. Company devices will be provided as and where appropriate to support team members to capture images of any Learning & Development within the school. Visitors will also be made aware of the requirement for them to adhere to this procedure when arriving to site and undergoing the visitor sign in process.

8.0 Safer Recruitment

8.0 The Outcomes First Group's *Safer Recruitment Policy* sets the processes which must be followed for the recruitment of team members and volunteers, which includes the requirement for PVG and other checks. Schools and colleges must inform shortlisted candidates that online searches may be done as part of pre-recruitment checks.

The Resourcing Team will add a statement to all vacancy adverts to inform candidates that online searches are done as part of due diligence for shortlisted candidates.

8.2 It is the responsibility of the Head of Service to ensure that the Single Central Record is compliant with legislation and statutory guidance and kept up to date and is stored confidentially.

8.3 It is the responsibility of the hiring manager at the school to ensure that copies of the documents used to verify the successful candidate's identity, right to work, required qualifications and references should be kept on their personnel file. The Head of Service and Safeguarding Governor should conduct regular audits to assure themselves that the correct documents are in place and stored safely.

Schools do not have to keep copies of PVG certificates, in order to fulfil the duty of maintaining the single central record. If the school retains them there must be a valid reason for doing so and it should not be kept for longer than six months as they are covered by UK GDPR/DPA 2018 Article 10.

9.0 Early Help

9.1 *The Children (Scotland) Act 1995 refers to a child in need as being in need of care and attention because he or she:*

- *is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development unless there are provided for him or her, under or by virtue of this part of the Act, services by a local authority.*
- *health or development is likely significantly to be impaired, unless such services are so provided*

- *is disabled.*

9.2 It is important that team members take swift and effective action to safeguard children and young people and to stop concerns from escalating. It may be that they will benefit from Early Help. All team members should be aware of their local early help process and understand their role in it.

9.3 Team members must be aware and alert to the possibility of Early Help being needed for those pupils who have particular vulnerabilities, such as those who:

- are disabled or have certain health conditions and specific additional needs
- have special educational needs (whether or not they have a statutory EHCP)
- are suffering from mental ill health
- are young carers
- are frequently missing/goes missing from education, home or care
- are persistently absent from school, including persistent absences for part of the day, or not in receipt of full-time education
- has experienced multiple suspensions and is at risk of, or has been permanently excluded
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- are at risk of modern slavery, trafficking, sexual or criminal exploitation, of being radicalised or exploited
- are in a family circumstance presenting challenges, such as drug and alcohol misuse, adult mental health issues, domestic abuse; a family member is in prison, or is offending
- are misusing drugs or alcohol themselves
- have returned home to their family from care
- are at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- are privately fostered
- has a parent or carer in custody or is affected by parental offending

9.5 Social care assessments should also consider where the child/young person is being harmed in contexts outside the home. It is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm

9.6 When a pupil has been referred for Early Help, it is the responsibility of the DSL to set up an inter-agency assessment as appropriate. Team members may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration must be given to a referral to children's social care for assessment for statutory services if the pupil's situation does not appear to be improving or is getting worse.

10.0 Reporting concerns

10.1 What to do if a pupil/student discloses

Well promoted, easily understood and easily accessible systems should be in place for pupils and students to confidently report abuse, neglect, exploitation, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

If a pupil/student discloses information to a team member, the team member must ensure that they:

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

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

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

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

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

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

11.1 As a result of an allegation or investigation a referral may be required. This can include referrals to Disclosure and Barring Service, Disclosure Scotland, Social Work England, Scottish Social Services Council (SSSC) and other professional bodies, including the Care Council for Wales (CCW), Teacher Regulation Authority/ General Teaching Council for Scotland (GTCS).

11.2 The Head of Service of the school is responsible for making the referral at the appropriate time. The timing of the referral can vary by nation and by the severity of the concern. The Head of Service must be familiar with, and follow, the national requirements and make the

referral at the appropriate time.

11.3 If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to the appropriate body must be made. **It is an offence in all UK nations not to make a referral to the appropriate disclosure body.**

11.4 If a referral is made, at the point of completion the Head of Service must notify safeagurding@ofgl.co.uk and the Human Resources Advisor hroperationsadvice@ofgl.co.uk of the referral and any other possible referrals to any relevant professional body in the United Kingdom, relating to the allegation made.

11.5 If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to DBS/ Disclosure Scotland must be made.

11.6 Where a teacher is dismissed or their services are no longer used because of serious misconduct, or might have been dismissed, or services ceased to be used had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

12.0 Partnership working and sharing information

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

12.2 General Data Protection Regulations

All schools must ensure that they comply with the Group's Data Protection Policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to pupil's personal information, as well as that of team members and parents/carers.

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

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

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

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

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

12.3 The school must ensure that they inform pupils, parents and carers of how their personal information will be stored and used. The following guidance is recommended for education team members: Data Protection in schools

12.4 The school must ensure that they hold emergency contact details of the parents/carers of pupils. This is to be done with the agreement of the parents/carers. The school must hold more than one set of contact details for each pupil, where reasonably possible.

12.5 Data breaches must be reported immediately to Group's Data Protection Officer as set out in

the Group's Data Protection Policy.

Please also see:
Information Sharing Advice for Safeguarding Practitioners (Pease that this advice is currently under revision, an updated draft is being consulted on: DRAFT Information Sharing Advice)
Improving multi-agency information sharing (publishing.service.gov.uk)

13.0 Child-on-child abuse

13.1 All team members should be aware that children and young people can abuse other children and young people (often referred to as child-on-child abuse), children and young people of differing ages, as well as similar ages, can abuse one another.

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

13.2 It is essential that all team members understand that abuse is abuse and the importance of challenging inappropriate behaviours between pupils. Team members should familiarise themselves with the **Child-on-Child Abuse Policy and Sexually Harmful Behaviour Guidance.**

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

13.3 Team members must ensure that they create a school environment where pupil safety is paramount and where unacceptable or unsafe behaviour is not tolerated. Team members must be aware and alert to incidents of online abuse between children, consensual and non-consensual sharing of nude and semi-nude images, sexual violence and sexual harassment between pupils and bullying.

This includes upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause the victim humiliation, distress or alarm. Team members must be alert to possible signs of child-on-child abuse. Inappropriate language must be rigorously and consistently challenged.

13.4 All team members should understand, that even if there are no reports in their schools, it does not mean it is not happening, it may be the case that it is just not being reported. Team members are advised to maintain an attitude of '**it could happen here'** and be vigilant to any signs.

13.5 It is important that team members are aware that pupils may not find it easy to tell an adult about their abuse. Pupils can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a team member may overhear a conversation that suggests a pupil/student has been harmed or a pupil's own behaviour might indicate that something is wrong. If team members have any concerns about a pupil's welfare, they should act on them immediately rather than wait to be told. **Team members must act immediately and report any concerns regarding child-on-child abuse to the DSL.**

13.6 It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.

13.7 Team members should explain to pupils and students in an appropriate way that the law is in place to protect them rather than to criminalise them. This should be explained in a way that avoids alarming or distressing them.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, e.g. sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent,
- consensual and non-consensual sharing of nude and semi-nude images and or videos
- upskirting
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group)

These forms of abuse can happen inside or outside of school both offline and online.

13.10 A contextual safeguarding approach must be taken when considering possible child-on-child abuse. Children and young people who display harmful behaviours must be seen as potential victims themselves, and the wider environmental risks must be taken into account. Team members must challenge any gender bias or derogatory language used by team members or pupils. Team members must not dismiss any concerns brought to them by pupils. Team members can report concerns verbally, but they must ensure that all concerns are recorded onto the school's electronic recording system by the end of the school day.

Shore Space is an online resource developed by the Lucy Faithfull Foundation in collaboration with the Home Office, offering a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

13.11 It is also important to understand intra familial harms and any necessary support for siblings following incidents, this applies whether siblings attend the same or a different school.

13.12 When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour.

Schools must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.

13.13 DSL must deal with any concerns of child-on-child abuse immediately and sensitively. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.

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

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

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

13.16 After the outcome/conclusion of the incident:

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

14.0 Bullying (Please also see the *Anti-bullying Policy*)

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

14.2 The Group has a zero-tolerance approach to bullying. Team members must help pupils and students to understand what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Team members must report any bullying concerns to the DSL **on the same day**. The concerns must be documented appropriately.

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

14.4 Please see the following government guidance on preventing and tacking bullying in schools:
Preventing and tackling bullying , Mental health and behaviour in schools
Behaviour in schools: advice for headteachers and school staff
See Rise Above for links to materials and lesson plans

Information on the Group's Wellbeing and Clinical Services can found on Engage.

15.0 Preventative Strategies

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

For pupils who are non-verbal or have limited receptive and expressive communication and learning disabilities, more direct on-going observation is often required to support them and keep them safe, along with the direct modelling of safe behaviour by those responsible for

their care and education. The support required must be tailored to the individual pupil's and be included in their Care Plan.

15.2 The school will take all appropriate action to ensure that pupils learn about appropriate relationships, keeping safe, online safety as well as sex and healthy relationships. Relationship, sex education (RSE) and health education lessons will focus on important age-appropriate issues in line with the RSE and health education statutory guidance. Team members must ensure that pupils have the opportunity to learn about safe relationships as well as who they can talk to if they have any concerns. Support and training materials for can be found here: Teaching about relationships sex and health

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

15.3 Pupils will be supported by team members to understand what abuse, neglect and exploitation are. Pupils must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse and be able to access relevant websites in private and helplines such as Childline to seek advice and help.

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

16.0 Online Safety and Security

Please also see the *Web Filtering & Monitoring Policy*, *Staying Safe Online Policy* and *Mobile and Smart Technology Policy*.

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

There are a range of resources to provide support for online safety in schools at: childnet.com

Pupils who are non-verbal or have limited receptive and expressive communication and learning disabilities will need further support. (Please see 15.1).

16.2 The school will work with parents and carers to help keep pupils safe online. Parents and carers will be informed about what their children and young people are being asked to do online, including the sites they will be asked to access and if their child/young person will be interacting with others online. The *Web Filtering & Monitoring Policy* includes information about the systems used to filter and monitor online use.

16.3 The Group requires safe and secure systems to be put in place within schools that limits the exposure to such risk. The Group operates a highly secure web filtering system on the internet link to the school to safeguard the school's computers and internet use and also offers safeguards on mobile phones and tablets used over the school's Wi-Fi network.

Web filtering and monitoring helps to keep pupils safe from illegal and inappropriate content and that they are protected from extremism online when using the school's Wi-Fi. The school works with the Group's IT Section to ensure that the filtering and monitoring systems are appropriate for the school, and are informed in part, by the risk assessment required by the Prevent Duty. The filtering and monitoring systems are reviewed at least annually.

South West Grid for Learning https://swgfl.org.uk/ have created a testing tool that can be used to check the filtering system is blocking access to illegal child sexual abuse material, unlawful terrorist content and adult content.

16.4 If a team member has reason to believe that a pupil is experiencing harm or is at risk of harm, the reporting process set out in this policy in Section 10 must be followed immediately.

16.5 If a team member becomes aware of an online incident that is a cause for concern, they should:

- Provide reassurance to the pupil.
- Take immediate action to report any criminal offences to the police and social care.
- Inform the pupil's placing authority and family as appropriate.
- Review the supervision and support arrangements for the pupil accessing the internet.
- Check the privacy and security settings on the pupil's devices and account.
- Agree what action will be taken to prevent recurrence and reduce risk, the risk assessment should be reviewed and updated. Further online safety learning requirements should be considered for the pupil.

16.6 Digital technology and its related risks are developing rapidly. An annual review of the school's approach to online safety will take place, supported by an annual risk assessment that considers and reflects the risks children and young people face. A free online safety self-review tool for schools can be found at https://360safe.org.uk/ or LGfL online safety audit

16.7 UKCIS provide a range of resources to support schools and colleges to further develop a whole setting approach towards online safety, including: Using external expertise to support online safety education

Further helpful resources for online safety:
UK Safer Internet Centre: Appropriate Filtering and Monitoring, Sextortion
UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings
DFE Advice Harmful Online Challenges and Online Hoaxes
National Crime Agency's CEOP education programme: ThinkuKnow and Cyber Choices
LGFL Undressed provides advice about how to teach children and young people about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

17.0 Children and young people who are absent from education

The DFE's statutory guidance Working together to improve school attendance sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

17.1 All team members must be aware of the risks associated with children and young people being absent from school or college. Prolonged or frequent absences can be a warning sign for a range of safeguarding issues, including neglect and exploitation - particularly county lines. It is important that the school or college's response to persistently absent pupils/students and children missing education must support the identification of such abuse, and in the case of absent pupils of compulsory school age, helps prevent the risk of them becoming a child missing education in the future.

It is important to be aware that children and young people already known to local authority social care, such as a looked after child, previously looked after child, a child in need or with a

child protection plan, may be at increased risk from known safeguarding risks if they are absent from education may increase known safeguarding risks.

Where there are serious concerns that a missing child or young person may be at risk of serious harm, this must be escalated in line with the Serious Incident Notification Policy within **24 hours.**

17.2 Early identification and timely intervention are key to protecting vulnerable children and young people. Schools and colleges must follow the procedures set out in their Attendance Policy to monitor and manage attendance. The attendance of pupils of compulsory school age will be managed in line with legal requirements and statutory guidance as detailed in the School Attendance Policy.

17.3 Attendance must be monitored through the setting's Senior Leadership Team meetings and governance.

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

Team members must report all unauthorised absences to the DSL, who must make contact with the pupil's parent/carer immediately to establish the pupil's whereabouts. The DSL must inform the placing authority of pupils who are frequently absent.

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

17.4 Pupils who are repeatedly absent from education are at increased risk of harm. Attempts must be made to talk to them about why they are absent from education. Records must be kept of those discussions. Any safeguarding information which the pupil discloses must be shared **immediately** with the local authority. If the pupil discloses immediate safeguarding concerns, the DSL must share this information with the police.

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

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

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

19.0 The school must write and implement a local exploitation procedure which team members must be familiar with. All team members **must** read the setting's Child Exploitation policy and refer to the National Guidance for Child Protection (2021).

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

18.5 Team members **must** report any concerns regarding exploitation **immediately** to the DSL and document their concerns appropriately **on the same day**. Where there are immediate concerns relating to a child's safety due to exploitation, DSLs must make a same day referral to the local authority and report the concerns to the police as well as to the Regional Director.

18.6 It is the responsibility of all team members to help children and young people know about grooming and exploitation. Schools and colleges must ensure that pupils/students know who to talk to if they have any concerns for themselves or others.

Please also see multi-agency principles - child exploitation and extra-familial harm

The Children's Society - Preventing Child Sexual Exploitation

The NWG Network provides Information to help educate and prevent child exploitation and abuse across the UK. The Group has membership of the network for all team members which can be accessed through the chat/help facility on the Welcome to the NFG Network page, or by emailing network@nwgnetwork.org

19.0 Serious violence

19.1 All team members should be aware of indicators, which may signal children and young people are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child or young person has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

Further guidance for professionals can be found here:

Advice to schools and colleges on gangs and youth violence

Criminal exploitation of children and vulnerable adults: county lines

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

20.0 'Honour'-based abuse including FGM and Forced Marriage

20.1 Honour based abuse (HBA) can be described as practices which are used to control behaviour within families or other social groups in order to protect perceived cultural and religious beliefs and/or honour. The term 'honour-based abuse and violence' relates to the offender/s interpretation of the motivation for their actions. It is a violation of human rights and for young victims it is a form of child abuse and is a child protection matter.

20.2 HBA can affect people of all ages but often begins early in the family home. Girls and women are particularly at risk; however, boys and men are also affected and may be at heightened risk if there are factors around disability, sexuality and mental health. Those subjected to it may find it particularly difficult to seek help as usual avenues seeking help, through parents or other family members may be unavailable.

20.3 HBA can take many forms, it can include: forced marriage; female genital mutilation; Breast ironing; virginity testing and/or physical, sexual and economic abuse and coercive control. Victims can experience multiple forms of abuse and multiple perpetrators can be involved.

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

20.5 In Scotland, The Female Genital Mutilation (Protection and Guidance)(Scotland) Bill has been law since April 2020. Whilst there is no mandatory reporting duty for teachers, schools do have a statutory responsibility to protect girls and young women at risk of FGM. In suspected cases of FGM, staff must refer to the local authority as well as the police. The DSL will assist and support team members with this.

20.6 Team members must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet': Female Genital Mutilation: the facts

20.7 The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or email fmu@fcdo.gov.uk. A Forced marriage resource pack has been designed to highlight examples of best practice and to help ensure that effective support is available to victims of forced marriage.

Multi-agency statutory guidance for dealing with **forced marriage**, can found at:
The right to choose government guidance on forced marriage

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

21.0 Preventing Radicalisation and the Prevent Duty

Team members must be familiar with the Protecting Children & and Young People from Radicalisation Policy

21.1 We fully recognise our responsibility to have arrangements in place to safeguard and protect children and young people from radicalisation. Section 26 of the Counterterrorism and Security Act 2015 places a statutory responsibility on schools and colleges to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the Prevent Duty

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

21.3 To safeguard children and young people who are vulnerable to radicalisation, DSLs will need to take a risk-based approach and consider an individual's behaviour in the context of wider influencing factors and vulnerabilities. Further information can be found at: Understanding and identifying radicalisation risk in your education setting

All team members must be aware of the local procedures relating to reporting radicalisation concerns. the Revised Prevent Duty Guidance for Scotland.

21.4 All team members must be aware of the local procedures relating to reporting radicalisation concerns.

22.0 Pupils requiring support with their Mental Health

22.1 We recognise that schools have an important role in supporting the health and wellbeing of their pupils.

22.2 Mental ill-health can be an indicator of a child or young person suffering or at risk of abuse, neglect or exploitation. All schools should have systems in place for identifying mental health problems and referring to appropriate agencies for additional support.

This will ordinarily be with the consent of the child/young person and their family. All details of concerns and any referrals or other support arranged for the child/young person should be documented on the school's electronic recording system.

22.3 The school can refer to Education Scotland's Hub Resources for school staff to support positive mental wellbeing of children and young people

Information on the Group's Wellbeing and Clinical Services for children & young people can found on Engage.

23.0 Physical Interventions

All team members must read and know the setting's Physical Intervention Policy and the Use of Restrictive Practices and Restraint Terms of Reference Policy.

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

The intervention and the follow-up action must be recorded on the school's electronic recording system.

23.2 If a pupil makes an allegation after a physical intervention, it is important that the team member writes down as much information as possible. Team members must complete body maps immediately after the event and make an appropriate electronic record. Team members must also verbally inform the DSL (or deputy) and record it onto the school's electronic recording system. **Medical attention must always be sought for the young person.** Team members must inform their parents or carers/ those with parental responsibility.

Allegations of harm relating to physical interventions must be reported to the Regional Director, the Director of Safeguarding/Safeguarding Adviser (safeguarding@ofgl.co.uk) and the Local Authority Designated Officer or local equivalent.

24.0 Allegations against team members

Please also see the Managing Allegations Against an Employee Policy

24.1 An allegation is any concern, complaint or disclosure that indicates a team member has:

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

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

24.3 When a pupil makes an allegation about a member of team member, the team member receiving the complaint must:

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

The DSL must:

- take all allegations seriously regardless of whether a pupil has made previous allegations;
- report allegations to the Local Authority Designated Officer or local equivalent within one working day;
- ensure that they follow the Group's Managing Allegations Against an Employee Policy.

24.4 It is important to outlines the importance of retaining oversight of any concerns or allegations about agency or supply staff or any team member employed by a third party working in the school. Whilst the individual may not be employed by the Group, **schools must ensure** that allegations are managed properly.

24.5 If the allegation is regarding the Head of Service then the Regional Director must be informed immediately. They will then seek advice from the Local Authority Designated Officer local equivalent.

24.6 All allegations made against team members must be reported to:

- the Regional Director
- Human Resources (peopleadvice@ofgl.co.uk)
- Director of Safeguarding/Safeguarding Adviser (safeguarding@ofgl.co.uk**)**

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

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

25.0 Low-level concerns

Team members must read and follow the ***Low Level Concerns Policy***

25.1 Team members must understand what low-level concerns are and be aware of the process for addressing low-level concerns.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that **an adult working in or on behalf of the school** may have acted in a way that is inconsistent with the Group's code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is not considered serious enough to consider a referral to the local authority designated officer or local equivalent.

Examples may include but are not limited to:

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

25.2 The Head of Service is the ultimate **decision maker in respect of low-level concerns**

All low-level concerns must be shared with the Head of Service, or the DSL. The **DSL must inform the** Head of Service of all the low-level concerns, in a timely fashion according to the nature of each particular low-level concern.

If there are concerns about the head of service these concerns should be referred to a senior member of the Group (such as the Regional Director, Operations Director, Managing Director, Chief Operating Officer or Chief Executive Officer). If there is a conflict of interest in reporting

the matter to any of these internal colleagues, the concern should be reported directly to the local authority designated officer or local equivalent.

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

25.4 Written records must be kept of the concerns in chronological order to establish a full picture of what is happening and if any child or young person may be at risk. Records should be reviewed regularly so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Head of Service should decide on an appropriate course of action.

25.5 Where there are three or more recorded low-level concerns in relation to the same team member, the Head of Service must notify HR peopleadvice@ofgl.co.uk so the collective concerns can be reviewed and further action taken as required. Advice and support can also be sought from safeguarding@ofgl.co.uk All reviews must be clearly recorded on HR file and on the low-level concern log.

26.0 Working with the Local Authority

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

27.0 Whistleblowing

27.1 We recognise that on occasion team members may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns that they may have. We also recognise that pupils will be unable to voice their concerns if they are in an environment where team members do not feel able to voice their concerns.

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

27.3 The Group has an anonymous telephone support system (Safecall) where team members are able to share any concerns that they may have, safely and without fear of reprisal. All whistleblowing concerns will be taken seriously and treated as such. Team members can call Safecall on **08009151571**, report online Safecall or email outcomesfirstgroup@safecall.co.uk

28.0 Alternative provision and work experience placements

Where a child or young person attends alternative provision e.g. college, horse-riding centre etc or a work experience placement, the school continues to be responsible for the safeguarding of that child/young person. The school must ensure that the provision has sufficient safeguarding arrangements in place and is able to meet the individual pupil's needs.

Schools should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child/ young person at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

Please also see the Alternative Provision Policy and the Work Experience Policy, and the DFE's statutory guidance to which schools and colleges must have regard to:

- Alternative Provision and
- Education for children with health needs who cannot attend school

29.0 Digital and Remote Learning

Where digital learning and remote leaning options are provided for pupils and students, all team members should be mindful that the group's and school's **safeguarding policies & procedures and Code of Conduct & Ethics Policy continue to apply at all times when working online or offline at any location.**

29.1 Acorn Digital Learning provides online teaching for those who currently find themselves without access to a school setting, or are unable to attend school for medical, mental health, anxiety or behavioural reasons. Acorn Digital Learning have produced a Live Online Risk Assessment, and Student Remote Learning policy and template can be utilised as required. Please email acorndigitallearning@ofgl.uk for information.

29.2 Data protection and GDPR considerations must be taken into account. This includes rules on signing pupils and students up to online services, and team members accessing personal data when working at home. It is recommended that team members are regularly reminded of the data protection and GDPR policies and procedures, whether they are working from the school or remotely.

29.3 The guidelines for digital leaning below must be followed:

- Ensure parents and carers are aware of online safety advice and resources such as Thinkuknow and Safer Internet Centre , Net-aware , Digital Parenting Pro
- If team members are concerned about a comment made online by a pupil or the work they share, the team member should take a screen shot and report it to the DSL via MyConcern / CPOMS (or the school's existing protocol as long as it is secure).
- Team members and pupils should be fully dressed and take into account the background/ surroundings. Team members should use a communal area, and anything in the background that could cause concern or identify family members/ personal information, should be removed or a sheet used.
- The teacher may need to give guidance to pupils to remove items from view. If a pupil is inappropriately dressed or in an unsuitable setting (e.g. a bedroom) they must be removed from the video call.
- Team members must not enter into one-to-one tuition voice or video call with an individual pupil or student without SLT agreement. If there is a need for single pupil interaction,

please ensure that a colleague is added to the call, or that a parent is present with the pupil.

- If a team member urgently needs to call a parent or pupil from their personal phone, the number must be withheld by dialling 141 first and a record of the call must made e.g. an email to the Headteacher, Principal or DSL to explain the purpose of the call and any actions taken as a result of it.
- Home filters may block different content at a different level to the school's filtering software; if this appears to be the case for one pupil in the group the teacher should revert to or suggest an alternative resource.
- Take care that any material provided to pupils to watch is age and developmentally appropriate. For instance, do not ask Year 9 pupils to watch a film with a 15 rating.
- Team members should model good online behaviour in all ways, including the language used to interact with pupils and colleagues, which should be respectful at all times

  School leaders should make clear to team members the operating times for online learning (for example, only during the normal school day); no team member should engage with or respond to a pupil outside these times.
- Clear guidelines for connecting to a virtual classroom session will be given by the school, and the teacher will check their understanding.
- The same principles apply to virtual meetings between team members and parents as face-to-face meetings.

Further helpful resources for digital learning:

- DfE advice: teaching online safety in schools
- UK Council for Internet Safety (UKCIS) guidance: Education for a connected world
- UKCIS External visitors guidance

30.0 Home visits

Where team members need to make home visits, they should be mindful of their own wellbeing and safety if conducting visits to the homes of pupils and their families. Team members must follow the Lone Working Policy and any local procedures and guidance, including informing at least one other team member of their whereabouts and the time they plan to return to the school. Wherever possible, arrange for a colleague to accompany you. This is particularly important for visiting households with identified risks to the safety of professionals. You should discuss and assess those risks with the appropriate local authority.

31.0 Policy Review

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

Outcomes
First Group