



Safeguarding and Child Protection Policy (Clifton Centre)

The Provision fully recognises its responsibilities for safeguarding and child protection.

Policy Reference	EX006c
Author	Executive Headteacher
Policy Agreed (date):	September 2024
Policy Published (including on website) (date):	September 2024
Next Review (date):	September 2025

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Version Control

Version	Author	Date	Changes
V 1.0	Executive Headteacher	September 2024	Initial draft as individual provisions to include version control
V 1.1	HR Director	March 2025	Added N Boydell as Prevent Lead

Key Personnel			
Role	Name	Telephone Number	Email Address
Executive Headteacher	Nikita Boydell	07591 657197	nikitaboydell@tbap.co.uk
Designated Safeguarding Lead (DSL)	Jo Woolley	07856 997420	jowoolley@tbap.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Josh Walker	07543 468414	joshwalker@tbap.co.uk
Designated Teacher for Looked After Children	Jo Woolley	07856 997420	jowoolley@tbap.co.uk
Prevent Lead	Nikita Boydell	07591 657197	nikitaboydell@tbap.co.uk
The key safeguarding responsibilities within each of the roles above, are set out in Keeping Children Safe in Education 2024			
Children's Social Care Referrals: Integrated Front Door: Out of hours			0300 456 0108 0300 456 0100
If you believe that a child is at immediate risk of significant harm or injury, you must call the police on 999.			

1. Introduction

The Provision is committed to safeguarding and promoting the welfare of children. We will fulfil our local and national responsibilities as laid out in the following key documents:

- [Working Together to Safeguard Children \(2023\)](#)
- [Keeping Children Safe in Education \(2024\)](#)
- [The procedures of Safeguarding Vulnerable People Partnership \(formerly WSCB\)](#)
- [Information sharing - Advice for practitioners providing safeguarding service to children, young people, parents and carers \(2024\)](#)

The aim of this policy is to ensure:

- all our learners are safe and protected from harm.
- safeguarding procedures are in place to help learners to feel safe and learn to stay safe.
- adults in the provision community are aware of the expected behaviours and the provision's legal responsibilities in relation to safeguarding and child protection.

2. Scope of the policy

Safeguarding children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a whole-provision preventative approach to keeping children safe, including online that incorporates learner health and safety; provision behaviour management and preventing child-on-child abuse; supporting learners with medical conditions; Relationships, Sex and Health (RSHE) education and Personal, Social, Health and Economic (PSHE) education; providing first aid and site security.

Consequently, this policy is consistent with all other policies adopted by the provision and should be read alongside the following policies relevant to the safety and welfare of our learners:

Relationships, Sex and Health Education/PSHE	Staff Behaviour Policy	Teaching and Learning policy
Online safety policy	Whistleblowing policy	Equality Statement

Behaviour policy, incl. learner use of mobile and smart technology	Complaints policy	Administration of medicines
SEND policy	Health and safety policy	

This policy applies to all staff in our provision.

For the purposes of this policy:

- Staff refers to all those working for or on behalf of the provision, full-time or part-time, in a paid or regular voluntary capacity.
- A volunteer is a person who performs an activity that involves spending time, unpaid in provision (except for approved expenses).
- Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- Child refers to all children on our provision roll and any child under the age of 18 who comes into contact with our provision. This includes unborn babies.

Any safeguarding concerns or disclosures of abuse relating to a child at provision, outside of provision and online are within the scope of this policy.

3. Expectations

All staff are:

- familiar with this safeguarding policy and have an opportunity to contribute to its review.
- alert to signs and indicators of possible abuse and wider safeguarding issues.
- aware of the importance of professional curiosity.
- able to record and report concerns as set out in this policy.
- able to deal with a disclosure of abuse from a child.
- involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required.

In addition, all staff have read and understood Part 1 or Annex A of the latest version of Keeping Children Safe in Education (KCSiE 2024). Provision leaders and staff who work directly with children have also read Annex B and Part 5.

4. Executive Senior Leadership Team

As key strategic decision makers and vision setters for the provision, the E-SLT will make sure that our policies and procedures are in line with national and local safeguarding requirements. E-SLT will work with the senior leaders to make sure the following safeguarding essentials are in place:

Training/Teaching	Policy/Procedures	Key safeguarding role
Whole provision approach to broad and balanced curriculum embedding safeguarding teaching	Child-on-child abuse	Designated Safeguarding Lead (DSL) who is a senior member of the leadership team.
D/DSL training	Learner voice	
Designated teacher training	Online safety	Deputy Designated Safeguarding Lead (DDSL)
KCSiE Part 1 or Annex A (and Annex B and Part 5 for staff working directly with children)	Whistleblowing	
Staff training, including regular safeguarding updates	Staff Behaviour Policy (for safer working practice), incl. low-level concerns about staff conduct	Designated teacher for children looked-after (even if there are no LAC on roll)
Children taught about keeping safe online	Early help	Senior mental health lead
Online safety training for staff	Mental Health	Pastoral and well-being staff
Preventing radicalisation	Multi-agency working	Filtering and monitoring & online safety lead.
Teaching staff confidence to deliver RSHE/PSHE to all learners	Children who are absent and/or missing from education	Senior attendance champion
Annual review of online safety arrangements	Children with SEND and a physical health issue	
	Reporting abuse, incl. dealing with a child at immediate risk / SVPP procedures	
	Honour based abuse (HBA)	
	Female Genital Mutilation (FGM)	
	Behaviour policy	
	Relationships, Sex and Health Education (RSHE) policy	
	Staff contribution to policy	
	Safeguarding policy review	

Concerns and allegations management

Our Executive Headteacher is responsible for liaising with the Local Authority Designated Officer for allegations (LADO) and other partner agencies in the event of an allegation of abuse being made against the Executive Headteacher.

See also 'Managing concerns and allegations against staff'.

Audit

The Executive Headteacher for safeguarding collaborates with the Head of Centre and the D/DSL to complete an annual safeguarding audit return to the local authority.

Safer Recruitment

Our Executive Headteacher monitors the provision's safer recruitment practice, including scrutiny around DSL and /or Executive Headteacher monitoring of the Single Central Record.

5. Monitoring and review

The Executive Headteacher ensures that the policies and procedures, adopted by the provisions (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff and should be easily understood by staff, children and parents, by re-visiting regularly.

The Heads of Centres report monthly to the E-SLT around the effectiveness of the provision's safeguarding procedures, and in particular, child-on-child incidents, including all aspects of trend analysis. The provision's approach to online safety and filtering and monitoring is reviewed annually as a minimum.

E-SLT ensures that safeguarding is an agenda item for every full E-SLT meeting.

The Head of Centre ensures that safeguarding is an agenda item for every staff meeting.

This policy is reviewed annually or earlier as required by changes to legislation or statutory guidance.

The Executive Headteacher meets the DSL every term (six times a year) to monitor the effectiveness of this policy.

6. Mandatory procedures - Staff and adults at provision

Safer recruitment

All staff are subject to safer recruitment processes and checks, and we follow the guidance set out in Part 3 of KCSiE (2024).

At the Provision, we scrutinise all applications for paid or voluntary posts. We undertake interviews and make appropriate checks through the Disclosure and Barring Service (DBS). We maintain a single central record (SCR) of the essential checks as set out in KCSiE, that have been carried out and certificates obtained. The SCR applies to:

- all staff (including supply staff and teacher trainees on salaried routes) who work at the provision.
- all members of the executive leadership team.
- assurances are sought for contractors who are required on site, including identification checks on arrival. Appropriate vetting checks are carried out by the provision for self-employed individuals.

Visitors

All visitors complete a signing in/out process, wear a provision ID badge and are provided with key safeguarding information including the contact details of safeguarding personnel in provision.

Scheduled visitors in a professional role (e.g. fire officer, police, NSPCC staff) are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at provision. Careful consideration is given to the suitability of any external organisations. The provision completes an assessment of the education value, the age appropriateness of what is going to be delivered by the scheduled visitor prior to booking a visit.

If the visit is unscheduled and the visitor is unknown to the provision, we will contact the relevant organisation to verify the individual's identity, if necessary.

Site safety

Risk assessments are undertaken and maintained in accordance with the provision's health and safety policy. The provision ensures that when our premises are hired or rented to other organisations (ASC, evening and weekend clubs) including shared site providers who work with children, those organisations adhere to the guidance for out-of-provision settings.

Off site visits and exchange visits

We carry out a risk assessment prior to any off-site visit and designate the specific roles and responsibilities of each adult, whether employed or volunteers. We seek written assurances from any alternative provision provider that appropriate safer recruitment checks have been completed, and safeguarding policy & procedures are in place. A site visit is also completed by DSL and/or SENCO.

Where there are safeguarding concerns or allegations that happen offsite, staff will follow the procedures described above and in the SVPP flowcharts as appropriate. A copy of the flowcharts is taken on off-site visits for reference.

Any adult over 18 in a host family will be subject to DBS checks. We work with partner provisions abroad to ensure that similar assurances are undertaken prior to any overseas visit by our learners.

See also Training.

Staff Behaviour Policy (for safer working practice)

The Provision is committed to positive academic, social and emotional outcomes for our learners underpinned by a strong safeguarding ethos. We are equally committed to the protection and welfare of our staff, who are expected to adhere to the highest standards of professional behaviour.

The Staff Behaviour Policy sets out staff behaviours that should be avoided as well as those that constitute safe practice and supports our commitment to safeguarding children.

Teaching staff are additionally expected to act within the guidance of the 'personal and professional conduct' section of the Teachers' Standards.

Identifying the signs

All staff know how to recognise and are alert to the signs of neglect, abuse, exploitation, and wider safeguarding issues, including but not limited to child-on-child sexual violence and harassment, child-on-child abuse, and 'all' risks of harm outside of the home and within the local area including online. Definitions of abuse, set out in 'What to do if you're worried a child is being abused - Advice for practitioners' (2015), 'Keeping Children Safe in Education' (2024) along with notes from safeguarding training, are important reference documents for all staff. Every member of staff is provided with a copy of Part 1 or Annex A of KCSiE which they are required to read, and which also includes supporting guidance about several specific safeguarding issues. Staff who work directly with children are also required to read Annex B and Part 5 of KCSiE (2024).

Responding to concerns/disclosures of abuse

Flowcharts provided by Wiltshire Council Safeguarding Team and SVPP that set out the required procedure for staff to follow when they have a safeguarding concern about a child are displayed in the staffroom and adult cloakrooms for easy reference.

Staff adhere to the organisation's safeguarding training requirements when concerned about abuse or when responding to a disclosure of abuse. Staff understand that they must NOT:

- take photographs of any injuries.
- postpone or delay the opportunity for the child to talk.
- take notes while the child is speaking or ask the child to write an account.
- try to investigate the allegation.
- promise confidentiality e.g. say they will keep 'the secret'.
- approach or inform the alleged abuser.

All staff record any concern about or disclosure by a learner of abuse or neglect and report this to the D/DSL using the standard form. It is the responsibility of each adult in provision to ensure that the D/DSL receives the record of

concern without delay. In the absence of the D/DSL, staff members know to speak directly to the IFD. In some circumstances, the D/DSL or member of staff seeks advice by ringing the IFD for advice.

The D/DSL will liaise with safeguarding partners and work with other agencies in line with Working Together (2018) and will refer to National Police Chief's Council guidance for provisions to understand when they should consider calling the police.

The D/DSL will 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.

The D/DSL consistently monitors all children with concerns, whether a request for service to the Wiltshire IFD or appropriate Local Authority Children's Services has been made or not.

During term time, the DSL and/or a DDSL is always available during provision hours for staff to discuss any safeguarding concerns. The D/DSL provides feedback to any staff who share concern/s.

The voice of the child is central to our safeguarding practice and learners are encouraged to express and have their views given due weight in all matters affecting them.

Online safety

Acceptable Use of the Internet

All learners, parents, staff, volunteers (if appropriate) are expected to sign an agreement regarding the acceptable use of the provision's ICT systems and the internet (ICT Acceptable Use Policy, appendices 1 to 3). Visitors will be expected to read and agree to the provision's terms on acceptable use if relevant. Use of the provision's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role. We will monitor the websites visited by learners, staff, volunteers and visitors (where relevant) to ensure they comply with the above using device monitoring and management software provided by Senso. More information is set out in the acceptable use agreements in the ICT Acceptable Use Policy, appendices 1 to 3.

Training

All new employees will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All employees will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

How the provision will respond to issues of misuse

Where a learner misuses the provision's ICT systems or internet, we will follow the procedures set out in our ICT Acceptable Use Policy. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate. Where an employee misuses the provision's ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance

with the staff disciplinary procedures/staff. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident. The provision will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

Examination of devices within the provision

The Executive Headteacher and any member of staff authorised to do so by the Executive Headteacher can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or learners, and/or
- Is identified in the provision rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so, as defined in the Online Safety Policy.

Monitoring arrangements

The Online Safety Officer logs behaviour and safeguarding issues related to online safety. An incident report log can be found in the ICT Acceptable Use Policy, appendix VII. Monitoring and filtering logs are recorded on the Senso Administration Portal.

Online safety is a running and interrelated theme which is reflected in our policies and procedures. Children are taught about safeguarding, including online safety. Online safety is considered as part of our whole provision safeguarding approach and wider staff training (including at induction) and curriculum planning. A personalised or contextualised approach is taken for more vulnerable children, victims of abuse and some children with SEND.

The Provision ensures that parents and carers are made aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the provision or college (if anyone) their child is going to be interacting with online. Parents and carers are offered advice and guidance in support of identifying the risks that may be present to children online.

The Provision acknowledges the fact many children have unlimited and unrestricted access to the internet via mobile phone networks, the provision will follow its policy on the use of mobile and smart technology in provision to safeguard children and will follow child-on-child abuse procedures when mobile phones are used by a child whilst in provision to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. The provision adheres to the DFE Filtering and Monitoring standards, and the Cyber Security Standards set out in KCSiE (2024). Our online safety mechanisms are reviewed annually.

Managing concerns and allegations against staff (including supply teachers, volunteers and contractors, and those from organisations or individuals using the provision premises)

The Provision follows the procedure set out by the SVPP 'Allegations against adults' flowchart which is displayed in the staffroom and adult cloakrooms for easy reference.

Where anyone in the provision has a concern about the behaviour of an adult (including online) who works or volunteers at the provision, including supply staff and contractors, and those from organisations or individuals using the provision premises, they must immediately consult the Executive Headteacher who will refer to the Local Authority Designated Officer for allegations (LADO).

Any concern or allegation against the Executive Headteacher will be reported to the HR Director without informing the Executive Headteacher.

All staff must remember that the welfare of a child is paramount and must not delay raising concerns for fear a report could jeopardise their colleague's career. The Provision promotes an open and transparent culture in which all concerns about adults working in or on behalf of the provision (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Any allegation of abuse will be dealt with in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

In addition to the concern/allegation management process, the provision's DSL will also refer suspected abuse to the Wiltshire IFD or appropriate Local Authority Children's services as described in 'responding to a concern.'

All members of staff and volunteers have read and signed to confirm they have understood the provision's Staff Behaviour Policy (for safer working practice), all supply staff and contractors are made aware of expectations of their behaviour.

Concerns and allegations reported relating to supply staff and contractors will be notified to their employers for investigation and potential referral to LADO.

The Provision will appoint a 'case manager' to lead any investigation where the reported allegation does not meet the allegations threshold to consider a referral to the LADO. This is the Executive Headteacher or where the Executive Headteacher is the subject of an allegation, the HR Director.

Managing low-level concerns about adults

The Provision operates a 'low-level' concerns policy in accordance with KCSIE. 'Low-level' refers to behaviour that is: inconsistent with expectations set out in the Staff Behaviour Policy, including inappropriate conduct outside of work, and/or does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the LADO.

All low-level concerns will be reported to the Executive Headteacher; low-level concerns about the Executive Headteacher will be reported to Sian Cox, HR Director.

The Provision will:

- ensure all staff are clear about what appropriate behaviour is (as set out in the Staff Behaviour Policy), and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empower staff to share any low-level safeguarding concerns;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised, for both the child/ren and the adult; and,
- respond to reports of low-level concerns in accordance with our HR conduct procedures by addressing unprofessional behaviour and support the individual to correct it at an early stage. If the concern has been raised via a third party, the Executive Headteacher will collect as much evidence as possible by speaking:
 - directly to the person who raised the concern, unless it has been raised anonymously;
 - to the individual involved and any witnesses.

Reporting low-level concerns helps to create and embed a culture of openness, trust and transparency in which the provision's values and expected behaviour are constantly lived, monitored and reinforced by all staff.

Staff are encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns will be recorded in writing, retained and reviewed to help recognise any weakness in the provisions safeguarding system so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Whistleblowing

In accordance with our provision's whistleblowing policy and procedures all staff and learners can raise concerns about poor or unsafe practice and potential failures in the provision safeguarding regime. Our whistleblowing procedures (including our child-friendly whistleblowing mechanisms), which are also reflected in staff training and our staff behaviour policy, and shared with learners, are in place for such concerns to be raised with the Head of Centre. Systems are in place and well promoted so that children can confidently report concerns or abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

If a staff member feels unable to raise an issue with the Head of Centre or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- The NSPCC whistleblowing helpline

Staff can call: 0800 028 0285 from 08:00 to 20:00, Monday to Friday, or email help@nspcc.org.uk.

A member of the E-SLT: Nikita Boydell or Sian Cox

Escalation of concerns

Effective working together depends on an open approach and honest relationships between colleagues and between agencies.

Staff must be confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our professional responsibility to promote the best safeguarding practice. Staff are encouraged to press for reconsideration if they believe a decision to act/not act in response to a concern raised about a child is wrong. In such cases the SVPP Case Resolution Protocol is used if necessary.

If we are on the receiving end of a professional challenge, we see this as an opportunity to reflect on our decision making.

Record keeping and information sharing

The Provision:

- liaises with partner organisations alternative provisions, Wiltshire Council, social services, youth offending, health, police, connect and commissioners to ensure any safeguarding records for learners are shared on transition and within 5 days for an in-year transfer or within the first 5 days of the start of a new term:
 - by the setting/provision/organisation previously attended by the child.
 - by our DSL when the child leaves our provision.

For any child dual-registered with another provision/setting/organisation, the provision continues to be responsible for the safeguarding of the placed learner thus the DSL will regularly liaise with the DSL at that base to ensure information is shared in the child's best interests. This includes contextual safeguarding information about relationships that young people form in their neighbourhoods, provisions and online to enable assessment and intervention to happen within these extra-familial contexts.

- keeps clear and comprehensive written records of all learner safeguarding and child protection concerns using an electronic recording system, with a body map, including how the concern was followed up and resolved as well as a note of any action taken, decisions reached and the outcome. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program, etc.
- ensures all learner safeguarding and child protection records are kept securely in a locked location.
- ensures the records incorporate the wishes and views of the learner.

The D/DSL acts in accordance with Information Sharing – Department for Education (DfE) (May 2024) and in line with the Wiltshire Council Record Keeping Guidance which includes details about file retention. Information about

learners at risk of harm is shared with members of staff in keeping with the seven golden rules to sharing information in the DfE guidance.

We are committed to work in partnership with parents and carers. In most situations, we will discuss initial concerns with them. However, the D/DSL will not share information where there are concerns that if so doing would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

When we become aware that a child is being privately fostered, we remind the carer/parent of their legal duty to notify Wiltshire Children's Social Care. We follow this up by contacting Children's Social Care directly.

7. Mandatory procedures - Supporting children

A culture of listening to children

We have a whole provision approach to listening to children and have systems in place which create an environment where children feel safe to share their concerns and worries and know they will be taken seriously. These systems operate with the best interests of the child at their heart.

Children can safely express their views and give feedback. The provision's safeguarding team is clearly identifiable to our learners. We regularly gather learner voices via forums and surveys, this data informs our practice and policies.

Curriculum – teaching about safeguarding

Our learners access a broad and balanced curriculum (age and stage of development appropriate) that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life.

We provide opportunities for learners to develop skills, concepts, attitudes and knowledge that promote their safety, and well-being. The PSHE and citizenship curriculum, incorporating Relationships, Sex and Health (RSHE) education specifically includes the following objectives:

- Developing learner self-esteem and communication skills
- Developing strategies for self-protection including online safety
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and within peer relationships (positive relationships and consent)

Examples of topics:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Remote learning

If the provision is required to change the way provision to children is offered due to exceptional circumstances e.g. during a pandemic lockdown, self-isolation, staff responsibilities to remain alert to the signs and risks of abuse to children will continue to apply. In such circumstances:

The DSL will:

- work closely with social care and partner agencies to support children in these circumstances and to identify children who may be at risk for the first time and/or benefit from additional support
- use specific local and national guidance about safeguarding in such circumstances to inform practice e.g. UK Safer internet centre guidance, DfE safeguarding and remote education and will ensure staff, children, and families are provided with written:
 - o amended DSL arrangements as required (names, location and contact details)
 - o temporary changes to procedures for working with children e.g. online.
 - o amended procedures for reporting concerns
 - o safeguarding training arrangements
 - o timescales for such changes so that all children, families and staff understand when such arrangements will end, and arrangements revert to those in place prior to the events leading to the need for the temporary changes.

We will ensure the curriculum we offer during such circumstances, continues to promote learners' spiritual, moral, cultural, mental and physical development.

Early help

At our provision, all our staff can identify children who may benefit from early help as a problem emerges and discuss this with the D/DSL.

The D/DSL uses:

- The Wiltshire's Integrated Front Door (MASH and Early Support Hub).
- The Digital Assessment and Referral Tool as appropriate as part of a holistic assessment of the child's needs.
- The Multi-Agency Thresholds guidance for Safeguarding Children on the Safeguarding Vulnerable People Partnership (SVPP) website about suitable action to take when a learner has been identified as making inadequate progress or having an unmet need.
- Liaises with Wiltshire SEND service
- Various resources to identify and respond to harmful sexual behaviour

Children with Special Education Needs and Disabilities (SEND) or physical health issues

Learners with additional needs or certain health conditions face an increased risk of abuse and neglect. Staff take extra care to correctly interpret apparent signs of abuse or neglect. We never assume that behaviour, mood or injury relates to the learner's additional needs without further exploration. Staff understand that additional challenges can exist when recognising abuse and neglect in learners with SEND, including communication barriers. Staff recognise that children with SEND are also at a higher risk of peer group isolation and can be disproportionately affected by bullying (including prejudice-based bullying).

To address those additional challenges, extra pastoral support is considered for children with SEND or physical health issues and they are also encouraged to discuss their concerns. The D/DSL works with the Special Educational Needs Co-ordinator (SENCo) to identify learners with additional communication needs and whenever possible, these learners are given the chance to express themselves to a member of staff with appropriate communication skills.

The use of 'reasonable force' in provision

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between learners or blocking a learner's path, or active physical contact such as leading a learner by the arm out of the classroom. The Provision follows DfE advice for provisions is available at [Use of Reasonable Force in Provisions](#).

All staff will follow our behaviour policy and all learners are encouraged to follow these expectations to reduce the need for the need for 'use of reasonable force.' Staff will work in collaboration with learners and parents/carers to plan positive, proactive behaviour support which may include support plans, referral to specialist agencies and agreeing actions to reduce the occurrence of challenging behaviour.

8. Mandatory procedures - Specific forms of abuse and safeguarding issues

Child-on-child abuse

All children have a right to attend provision and learn in a safe environment. All child-on-child abuse is unacceptable and will be taken seriously.

In addition, we have a zero-tolerance approach and will respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the provision, and/or online.

Staff recognise that while both boys and girls can abuse their peers, it is more likely that girls will be victims and boys instigators of such abuse. Children who are LGBT may be targeted by other children. Child-on-child abuse is not tolerated, passed off as "banter" or seen as "part of growing up". The different forms of child-on-child abuse is likely to include, but not limited to:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- 'upskirting' or any picture taken under a person's clothing without their permission or them knowing to obtain sexual gratification or cause humiliation, distress or alarm.
- causing someone to engage in sexual activity without consent
- initiation/hazing type violence and rituals.
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting)
- sexual violence and sexual harassment between children, as defined by Sexual offences act 2003 which considers rape, assault by penetration and sexual assault, all types of sexual violence. Sexual violence and sexual harassment can be between two children, or a group of children and can occur online and offline.

Consequently, child-on-child abuse is dealt with as a safeguarding issue, recorded as such, and not managed through the systems set out in the provision behaviour policy.

Any learner who may have been victimised and/or displayed such harmful behaviours, along with any other child affected by child-on-child abuse, will be supported through the provision's pastoral system and the support will be regularly monitored and reviewed.

We will address inappropriate behaviour (even if it appears to be relatively innocuous) as this can be an important intervention that may help prevent problematic, abusive and/or violent behaviour in the future.

We acknowledge that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. Staff maintain an attitude of 'it could happen here' where safeguarding is concerned.

We minimise the risk of child-on-child abuse by providing:

- a relevant, effective curriculum, that helps children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe. The curriculum is updated to reflect changes in legislation, and the mandatory teaching of Relationship Education, Relationship and Sex Education and Health Education
- established/publicised systems for learners to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously
- training to all staff so they understand that child-on-child abuse can and does happen and are trained to be alert to any behaviours that could cause concern
- a clear procedure for all staff to report all incidents as a safeguarding concern to the provision D/DSL.

Child-on-child sexual violence and sexual harassment

The DSL will follow local and national guidance when there has been a report of sexual violence and harassment between children. This will include liaising with other professionals to develop robust risk and needs assessments and multi-agency safety planning with appropriate specialist targeted work for learners who are identified as posing a potential risk to other children. This is done using a Contextual Safeguarding approach to ensure assessments consider risks posed by any wider environmental factors present in a child's life. The DSL will record specifically the time and location of the incident, and any action required to make the location safer.

The NSPCC has a dedicated helpline 0800 136 663 to provide children who are victims of sexual abuse in provisions with appropriate support and advice. The helpline also provides support to parents and professionals.

Serious violence

We are committed to success in learning for all our learners as one of the most powerful indicators in the prevention of youth crime.

Our curriculum includes teaching conflict resolution skills and understanding risky situations to help our children develop the social and emotional skills they need to thrive.

Staff are trained to recognise both the early warning signs of contextual risks and that learners may be susceptible to exploitation and getting involved in gangs as well as indicators that a learner is involved in serious violent crime. They are also aware of the associated risks and know the measures put in place to minimise such risks.

Children who are absent and/or missing from education

Staff report immediately to the D/DSL, if they know of any child who may be:

- Absent from education persistently, or for prolonged periods and/or on repeat occasions
- Missing – whereabouts unknown or
- Missing education – (compulsory provision age (5-16) with no provision place and not electively home educated)

The designated teacher for CLA and care leavers discusses any unauthorised/unexplained absence of Child Looked After with Virtual Provision when required.

The DSL shares any unauthorised/unexplained absence of children who have an allocated social worker within 24 hours.

Children who do not attend provision regularly can be at increased risk of abuse and neglect. Where there is unauthorised/unexplained absence, and

- after reasonable attempts have been made to contact the family without success, the DSL follows the SVPP procedure and consults/refers to the IFD team as appropriate.
- there are no known welfare concerns about a learner, we follow our procedures for unauthorised absence and report concerns to the commissioner who referred the learner.

Mental health

All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff understand that:

- abuse and neglect, or other potentially traumatic adverse childhood experiences can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how
- these experiences can impact on children's mental health, behaviour and education.
- they have a duty to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, they will report this concern using the agreed reporting mechanisms.

Domestic abuse

Staff understand that domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional harm, including where they see, hear or experience its effects.

The DSL liaises with partner agencies as part of 'Encompass' in Wiltshire. When police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the DSL ensures the organisation receives up to date relevant information about the child's circumstances and will ensure key staff provide emotional and practical support to the child according to their needs.

Preventing radicalisation

Protecting children from the risk of radicalisation is part of provisions' wider safeguarding duties and is similar in nature to protecting learners from other forms of harm and abuse.

Staff use their judgement in identifying learners who might be at risk of radicalisation and speak to the D/DSL if they are concerned about a learner. The D/DSL will always act proportionately, and this may include making a Prevent referral to the Channel support programme or to the Local Authority Children's Services.

Female Genital Mutilation (FGM)

FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Staff will inform the D/DSL immediately if they suspect a girl is at risk of FGM. We will report to the police any 'known' cases of FGM to the police as required by law.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Staff will inform the D/DSL immediately if they suspect a child is at risk of forced marriage.

9. Staff training

Induction

The welfare of all our learners is of paramount importance. All staff including E-SLT and regular volunteers are informed of our safeguarding policy and procedures including online safety, at induction.

Our written induction schedule for staff also includes:

- Safeguarding and Child Protection policy and procedures
- Online safety
- KCSiE update
- Whistleblowing policy
- Behaviour Policy (learners)
- Staff Behaviour Policy (or Code of Conduct)
- Role and identities of the DSL and DDSL
- The provision's response to children who are absent and/or missing from education, and the provision's protocol about managing absence
- Procedure to follow in case of an allegation being raised against an adult
- Professional disagreement and escalation including the SVPP Case Resolution Protocol

Safeguarding training

This training is for all staff and is updated yearly to ensure staff understand their role in safeguarding. Any member of staff not present at this whole provision session will undertake this statutory training requirement on their return.

In addition, all staff members receive safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as necessary and at least annually. All staff also receive training in online safety and this is updated as necessary.

Advanced training

The D/DSL has additional multi agency training which is updated every two years as a minimum. The D/DSL also attends multi-agency courses relevant to provision needs. Their knowledge and skills are refreshed at least annually e.g. via e-bulletins or safeguarding networking events with other D/DSLs. The D/DSL attends a Wiltshire IFD tour.

Safer Recruitment

At least one person on any appointment panel has undertaken Safer Recruitment Training. This training is updated every three years as a minimum.

Designated Teacher for Children Looked After and Children Previously Looked After

The designated teacher for looked after children has attended training specific to the role.

Preventing Radicalisation

All staff undertake Prevent awareness training annually.

Staff support

Due to the demanding, often distressing nature of child protection work, we support staff by providing an opportunity to talk through the challenges of this aspect of their role with a senior leader and to seek further support as appropriate.

Appendix I - Related legislation and key documents

Children Act 1989 (and 2004 update) - The Children Act 1989 gives every child the right to protection from abuse and exploitation and the right to have enquiries made to safeguard his or her welfare. The Act place duties on several agencies, including provisions, to assist Social Services departments acting on behalf of children and young people in need (s17) or enquiring into allegations of child abuse (s47).

Education Act 2002 - This requires provisions to make arrangements to safeguard and promote the welfare of children and to have regard to guidance issued by the Secretary of State for Education.

Sexual Offences Act 2003 - This act sets out an offence of 'abuse of trust' - a sexual or otherwise inappropriate relationship between an adult who is responsible for young people and a young person in his/her care.

Information Sharing – Department for Education (DfE) Advice for practitioners providing safeguarding services to children, young people, parents and carers 2024 This advice is for all frontline practitioners and senior managers working with children, young people, parents and carers who have to make decisions about sharing personal information on a case by case basis.

Counter-Terrorism and Security Act 2015 (the CTSA 2015), section 26 requires all provisions, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

Mental health and behaviour in provisions (2018) - advice to help provisions to support learners whose mental health problems manifest themselves in behaviour. It is also intended to be helpful to staff in alternative provision settings, although some of the legislation mentioned will only apply to those alternative provision settings that are legally classified as provisions.

The Safeguarding Vulnerable Groups Act (2006) - Section 53(3) and (4) of this applies to provisions if they broker learner accommodation with host families for which the host family receives a payment from a third party, such as a language provision. At a future date, the regulated activity provider will have a duty to carry out a barred list check on any new carer – section 34ZA Safeguarding Vulnerable Groups Act 2006.

The Teachers' Standards (2013) - set a clear baseline of expectations for the professional practice and conduct of teachers and define the minimum level of practice expected of teachers in England.

Children Missing Education (2016) - Statutory guidance for local authorities and advice for other groups on helping children who are missing education get back into it.

Preventing and Tackling Bullying (2017) - Advice for provisions on effectively preventing and tackling bullying.

Behaviour and Discipline in Provisions (2016) - Advice for headteachers and provision staff on developing provision behaviour policy, including an overview of their powers and duties.