

# Cross Keys Learning Safeguarding & Child Protection Policy

**Author:** Steve Fuller  
**Approved by:** Sharon Mount  
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**Executive Summary:** This policy provides details of the core principles which underpin the organisation’s approach to managing safeguarding students.

Cross Keys Learning believe the safety and welfare of all students is our highest priority. We are committed to safeguarding and expect everyone who works within the school to share this commitment. Adults within our School take all welfare concerns seriously and encourage student’s and young people to talk to us about anything that worries them. We will always act in the best interests of the child. We are clear that every student is provided with a secure and caring environment so that they can learn in safety. In all matters relating to child protection the school will follow the procedures laid down by Kent Local Safeguarding Children Board (LSCB) together with DfE guidance contained in Working Together to Safeguard Children (2018) and Keeping Children Safe in Education (KCSIE 2020).

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## **1. Introduction**

Cross Keys Learning are committed to practice which promotes the wellbeing of children and young people and helps keep them safe from harm. Staff and volunteers in Cross Keys Learning recognise and accept our responsibility to develop awareness of the issues which cause children and young people harm. Harm will be related to: physical, emotional, sexual abuse and neglect, as well as harm arising from a

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes

- DfE guidance Keeping Children Safe in Education 2020 (KCSIE 2020)
- Working Together to Safeguard Children 2018 (WTSC)
- Framework for the Assessment of Children in Need and their Families (2000)
- Kent and Medway Online Safeguarding Children Procedures (2014)

Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

Ofsted's definition of safeguarding:

“Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to pupil's welfare, health and safety.” (Briefing for Section 5 Inspectors on Safeguarding Children, Ofsted April 2015)

## **2. School Policies on Related Safeguarding Issue**

We are aware that child protection and safeguarding are fundamental to the welfare of all children in our care. This Policy, therefore, should be read in conjunction with the wider safeguarding policies as listed below.

Policies related to this document:

1. On-line safety Policy
2. Behaviour Management Policy
3. Searching screening and confiscation policy.
4. Bullying / Anti-Bullying
5. Prevent policy
6. Health and Safety Policy
7. Procedures for Managing Allegations Against Staff policy
8. Safer recruitment
9. Whistle-Blowing Policy
10. Children missing in education policy
11. Attendance policy
12. Risk assessment Policy
13. First Aid and Accident Policy
14. Drug and Alcohol Misuse Policy

### 3. Ethos

Cross Keys Learning believe that we are a community and all those directly connected (staff, directors, parents, carers, families and students) have an essential role to play in making it safe and secure. We welcome suggestions and comments that will contribute to this process.

Safeguarding and promoting the welfare of children is defined for the purposes of the KCSIE 2020 guidance as:

- protecting children from maltreatment;
- 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; and

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

"Schools and colleges and their staff form part of the wider safeguarding system for children" (DfE KCSIE September 2020) It is imperative that all staff working for Cross Keys Learning are fully aware of their responsibility to report any concerns they have to the Designated Safeguarding Lead (DSL).

"Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes in to contact with children has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means they should consider at all times what is in the best interests of the child. No single professional can have a full picture of a child's needs and circumstance. If children and families are to receive the right help at the right time, everyone who comes in to contact with them has a role to play in identifying concerns, sharing information and taking prompt action"

Part of the role of the school's Designated Safeguard Lead is to coordinate information given to them by staff and to decide on the best course of action and this is why it is important that staff pass on all concerns. Initially a concern may appear minor but in the context of a number of minor concerns being highlighted there may appear a significant pattern developing. It is essential that all staff err on the side of caution.

Cross Keys Learning recognises the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We also recognise that children who are abused or witness violence are likely to have low self- esteem and may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school environment may be the only stable, secure and predictable element in their lives.

Therefore, Cross Keys Learning will endeavour to support the welfare and safety of all pupils through:

- Maintaining children's welfare as our paramount concern.
- Ensuring the content of the curriculum includes social and emotional aspects of learning.
- Ensuring that child protection is included in the curriculum to help children stay safe, recognise when they don't feel safe and identify who they might / can talk to, and are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum, and are taught to recognise when they are at risk and how to get help when they need it.
- Providing suitable support and guidance so that students have a range of appropriate adults to approach if they are in difficulties.
- Promoting a positive, supportive, neutral and secure environment where pupils can develop a sense of being valued and heard in their own right.
- Ensuring all steps are taken to maintain site security and student's physical safety.

- The school will assess the risks and issues in the wider community when consider the well-being and safety of its pupils.
- Working with parents and carers to build an understanding of the school's responsibility to ensure the welfare of all children including the need for referral to other agencies in some situations.
- Ensuring all staff are able to recognise the signs and symptoms of abuse and are aware of the school's procedures and lines of communication.
- Monitoring children and young people who have been identified as having welfare or protection concerns; keeping confidential records which are stored securely and shared appropriately with other professionals.
- Developing effective and supportive liaison with other agencies

#### **4. Responsibilities**

In order to meet our responsibilities effectively, all staff will consider, at all times, what is in the **best interests** of the student.

##### **Organisational Responsibilities**

The role of the school is to contribute to the early identification, referral, and assessment of students in need including those who may have suffered, be suffering or are at risk of suffering significant harm. We acknowledge that we may also have a role in the provision of services to Children in Need and their families, and will work, where relevant, with social care, the police and health services.

**The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.**

In order to protect confidentiality, safeguarding information about individual students is shared on a need to know basis only and thus, what may seem to be a minor issue to one staff member, may be highly significant to the bigger picture of risk.

The Head Teacher and Operations Director both fulfil the role of Designated Safeguarding Lead (DSL), and Deputy DSL.

**The DSL and / or the deputy can be contacted at any time (during school hours) for staff to raise or discuss any safeguarding concerns. The DSL will accept out of hours contact via mobile phone.**

##### **Designated Safeguarding Lead**

The Designated Safeguarding Leads (DSLs) are fully trained for the demands of this role in child protection and inter-agency working in accordance with the locally agreed procedures and as set out in Annex B of Keeping Children Safe in Education 2020. They are members of the senior leadership team at our School.

Both the DSLs and Deputy undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. They also attend annual refresher updates to ensure that they remain conversant with best practice and to keep up with developments relevant to their role. Focused training supports learning and understanding of the ever-changing landscape of safeguarding, which is underpinned by legislation and guidance, and which includes issues such as radicalisation. Prevent awareness training enables them to provide advice and support to staff on protecting students from the risk of radicalisation. The DSL's and the school's focus are to support students in need through seeking early help and/or inter agency working.

The DSL will make prompt contact with children's social care where there are concerns that a student may be in need of help or is at risk of harm. The DSL will also make prompt contact with the Local Authority Designated Officer ("LADO") in relation to allegations against someone working at the School and/or the police if a criminal offence is suspected.

The DSL will liaise with the local authority when necessary and work with other agencies in line with Working Together to Safeguard Children 2018 and attend strategy meetings. The DSL will work with partner agencies to seek advice, support, and guidance, drawing on multi agency expertise, knowledge, and experience to support students at risk of harm including emotional and intellectual harm via social media and use of the internet.

### **The key role of the Designated Safeguarding Lead is to:**

The Designated Safeguarding Lead is responsible for safeguarding and child protection at Cross Keys Learning]. The key role of the Designated Safeguarding Lead is to:

- manage referrals from school staff or any others from outside the school;
- work with external agencies and professionals on matter of safety and safeguarding;
- undertake training;
- raise awareness of safeguarding and child protection amongst the staff and parents; and
- ensure that child protection information is transferred to the pupil's new school
- be aware of pupils who have a social worker
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.

### **Staff Responsibilities**

All staff members are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. It is essential that they support students and work collaboratively to provide stability in the lives of students who may be at risk of harm.

They have a responsibility to:

- Provide a safe environment in which students can learn
- To be aware of the types of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.
- Be aware of the early help process and understand their role in it.
- To take appropriate action, working with services as needed.
- Be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.
- The process for making referral to Children's Social Care
- Know what to do if a child tells them he/she is being abused or neglected and how to share information appropriately.

If staff members are unsure, they should always speak to the designated safeguarding lead.

If the DSL is not available, staff should speak to a member of the SLT and/or take advice from local children's social care (KCSIE 2020), paragraph 26)

All staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

The welfare and safety of children however are the responsibility of all staff in school and ANY concern for a student's welfare MUST be reported to the DSL.

In relation to Cross keys learning, where there are concerns about the proprietor of an independent school, the member of staff should contact the local authority Designated Officer without delay.

In order to protect confidentiality, safeguarding information about individual children is shared on a need to know basis only, however, what may seem to be a minor issue to one staff member, may be highly significant to the bigger picture of risk, and therefore this information is often shared.

## **5. Safeguarding and Child protection procedures**

Cross Keys Learning adheres to the KSCB Safeguarding Children Procedures (2014). The full KSCB procedures document and additional guidance relating to specific safeguarding issues can be found on the KSCB website [www.kscb.org.uk](http://www.kscb.org.uk)

All staff have been provided with a copy of Part one of the DfE guidance "Keeping Children Safe in Education September 2020" that covers Safeguarding information.

It is the responsibility of the Cross Keys Learning DSL to receive and collate information regarding individual children, to make immediate and on-going assessments of potential risk and to decide actions necessary (with parents/carers in most cases). This includes the need to make referrals to partner agencies and services. To help with these decisions the DSL may choose to consult with the Area Education Safeguarding Adviser or Duty Social Workers who offers opportunities for consultation as part of the Child in Need / Child Protection process.

Issues discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents/carers are made aware of these.

New referrals to Services will be made using the agreed process i.e. the Early Help Notification form or inter-agency referral form for referrals to 'Front Door Team'. These will be made with reference to the Kent Interagency Threshold Criteria for Children in Need. In situations where there are felt to be urgent or grave concerns, a telephone referral will be made prior to the form being completed and sent to the Central Duty Team. Concerns for children who are already known to Services will be passed to the allocated social worker/ Team.

In all but the most exceptional circumstances, parents /carers will be made aware of the concerns felt for a child or young person at the earliest possible stage. In the event of a referral to Specialist Children's Services being necessary, parents/carers will be informed and consent to this will be sought unless there is a valid reason not to do so.

## **6. Recognition and categories of abuse:**

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

The definition of abuse is "a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely by others (eg via the internet). They may be abused by an adult, adults or another child or children"

All staff should be aware of the definitions and signs and symptoms of abuse some of which are listed below. In a school staff should also be aware of the possibility of peer on peer abuse. This is most likely to include, but not limited to bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the school's procedures regarding peer on peer abuse.

There are four categories of abuse:

- Physical abuse  Sexual abuse  Emotional abuse  Neglect

The most up to date definitions and possible indicators and signs of abuse are found in Part 1 of 'Keeping Children Safe in Education 2020' and What to do if you are worried a child is being abused.

Staff need to remember that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. Children may be abused in a family or in an institutional or community setting, by those known to them or by a stranger, including, via the internet. In the case of female genital mutilation, children may be taken out of the country to be abused. They may be abused by an adult or adults, or another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over a period of time but can also be a one-off event. Child abuse and neglect can have major long-term impacts on all aspects of a child's health, development and well-being.

The warning signs and symptoms of child abuse and neglect can vary from child to child. Disabled children may be especially vulnerable to abuse, including because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening. Children also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health. By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

## **7. Induction and training**

All Cross Keys Learning staff be they teaching staff or mentors will be offered an appropriate level of safeguarding training. This will include internal school responsibilities, child protection processes, how to recognise and respond to signs and symptoms of concern and abuse and safe working practice. Training is organised by the DSL in line with government guidance that currently requires this to be updated annually for staff.

The school leadership team will ensure the DSL attends the required DSL safeguarding training when they first take up the role and that they continue to update their knowledge on an on-going basis and at least every year as required by guidance. In addition to the DSL lead there are three other members of staff trained in the role of DSL to act as deputies.

The DSL will ensure that all new staff and volunteers are appropriately inducted as regards the school's internal safeguarding procedures and communication lines. A summary information sheet is available to be given to staff and volunteers to support this process.

All staff are required to attend safeguarding training annually with updates also being delivered by email where appropriate. Safeguarding is a standing agenda item on all staff meetings

Induction training for new staff at Cross keys Learning:

The key training elements are:

Induction Training – this is mandatory and should include;

- the child protection policy;
- the behaviour policy;
- the staff behaviour policy (sometimes called a code of conduct);
- the safeguarding response to children who go missing from education; and



the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). (KCSIE 2020)

The DSL will provide an annual report detailing safeguarding training undertaken by all staff and will maintain up to date registers of who has been trained.

## **8. Record keeping**

Staff must record any welfare concern that they have about a child on the CKL CPOMS safeguarding system. The CPOMS system allows staff to complete the form and alert the DSL electronically, and must be completed delay. Records must be completed as soon as possible after the incident/event and must be signed and dated. ALL staff will be trained on the CPOMS systems as part of the induction into their role.

An safeguarding records are kept separate from all other record relating to the child in KMS. They are retained centrally and securely by the DSL and are shared on a 'need to know' basis only.

Detailed guidance on Record Keeping is found in a separate document "Guidelines for Safeguarding Record Keeping in Schools" – Staff MUST familiarise themselves with the responsibilities outlined in this document.

All safeguarding records will be forwarded to a child's subsequent provider under confidential and separate cover to the DSL / Principal/Headteacher.

## **9. Allegations against members of staff and volunteers**

Cross Keys Learning recognises that it is possible for staff and volunteers to behave in a way that might cause harm to children and takes seriously any allegation received. Such allegations should be referred immediately to the DSL and Operations manager/Head of Education who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. Should staff have concerns about the Principal or DSL they should refer direct to the Director responsible for Safeguarding or to the LADO direct.

All staff need to be aware of the 'Whistle-blowing procedure' and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. When in doubt – consult.

## **10. Whistle blowing**

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- an legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

## **11. Working with other agencies**

Cross Keys Learning recognises and is committed to its responsibility to work with other professionals and agencies both to ensure children's needs are met and to protect them from harm. We will endeavour to identify those children and families who may benefit from the intervention and support of external



professionals. Local Safeguarding Children Boards (LSCBs) will be replaced and the three safeguarding partners who must work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

Schools are not the investigating agency when there are child protection concerns and the school will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required and recognise a crucial part of this may be in supporting the child while these take place.

Cross Keys Learning recognises the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help Teams around the Child / Family. The School Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

## **12. Confidentiality and information sharing**

We recognise that all matters relating to child protection are confidential. The Head Teacher or DSL will disclose any information about a student to other members of staff on a need to know basis.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. Further advice on dealing with disclosures can be found in the document "DfE Guidance on Information Sharing" (March 2015).

## **13. Curriculum and staying safe**

We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

The Cross Keys Learning school curriculum will provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

Systems have been established to support the empowerment of students to talk to a range of staff. Students at Cross Keys Learning will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate.

## **14. On-line safety**

It is recognised that the use of new technologies presents challenges and risks to children both inside and outside of school. Cross Keys Learning will ensure a comprehensive curriculum response to enable all students to learn about and manage the associated risks effectively and will support parents and the school community (including all members of staff) to become aware and alert to the needs of keeping children safe online.

## **15. Supervision and support**

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL. All newly qualified teachers and classroom assistants receive induction training and have a buddy with whom they can discuss concerns including the area of child protection.

All Cross Keys Learning staff will receive 2 weekly supervision during their probation period and then monthly once they have been confirmed in post. Safeguarding is a standing agenda item in all supervision sessions and each session will contain an element of 'reflective practice' to discuss key learning from key events from the previous session.

## **16. Safe working practice**

All Cross Keys Learning Staff are required to work within clear Guidelines on Safe Working Practice / the school's Code of Conduct.

Children may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all staff should take care not to place themselves in a vulnerable position regarding child protection or potential allegations. For example, it is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in Guidance for Safer Working Practice for Adults who Work with Children and Young People, the school's on- line safety policy and Acceptable Use Policy and the KSCB document : Safer Practice with Technology – Guidance for Adults who Work with Children and Young People.

### **17. Complaints procedure**

The school has a Complaints Procedure available to parents, students and staff who wish to report concerns. This can be found in the staff room and on the Cross Keys Learning website.

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific Procedures for Managing Allegations Against Staff.

### **18. Safer recruitment**

Cross Keys Learning is committed to ensuring that all steps are taken to recruit staff and volunteers who are safe to work with our students. We comply with the Independent School Standards and in accordance with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2020). We prevent people who pose a risk of harm from working with students by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required. Volunteers are subject to an Enhanced DBS check and the same induction process as permanent staff.

Any staff member who is aware of anything that may affect his/her suitability to work with children must notify the school immediately. This will include notification of any convictions, cautions, court orders, reprimands, or warnings he/she may receive. He/she must also notify the school immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

The guidance in KCSIE 2020 should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or

behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Recruitment and selection procedures are designed to deter, reject, or identify people who might abuse students or who might be unsuitable to work with them. The Head teacher, who is responsible for

ensuring that the school follows safer recruitment practice including scrutinising applicants, verifying identity, academic and vocational qualifications, obtaining professional references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job.

As part of carrying out safe recruitment procedures under KCSIE 2020, members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, are subject to the necessary statutory child protection checks before starting work. This includes an enhanced DBS check with 'barred list' information for all appointments. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Until the school has a cleared DBS, newly appointed staff will not be left unaccompanied with students. Alternatively, if the applicant has subscribed and has given permission, we may undertake an online update check through the DBS Update Service.

The Home Office has introduced a requirement that an overseas criminal record certificate will be required from any country where the applicant for a visa has worked for 12 months or more in the 10 years prior to their application. The new rules will assist in meeting our safer recruitment obligations because we should be able to use the certificate obtained in the immigration process to satisfy the requirement in Keeping Children Safe in Education, e.g. to “make any further checks [on individuals who have lived or worked outside the UK] they think appropriate so that any relevant events that occurred outside the UK can be considered”.

In accordance with guidance, Cross Keys Learning will:

- Maintain a Single Central Record, which includes prohibition checks where applicable;
- Ensures an enhanced DBS Enhanced disclosure and a children’s barred list is obtained for all new appointments, including volunteers;
- Complete additional checks in respect of any new appointments who have lived / worked outside the UK;
- Complete prohibition checks on all staff undertaking ‘teaching duties’;
- Where relevant undertake a Section 128 direction for those in management positions

**At least one senior member of staff responsible for recruitment who is on the interview panel has completed Safer Recruitment Training.**

Where concerns develop about an existing staff member's suitability to work with children, we will carry out all relevant checks as if the individual were a new member of staff.

Cross Keys Learning acknowledge its legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a student; if there is reason to believe the member of staff has committed one of a number of listed offences; has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

Cross Keys Learning will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

If an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff, Cross Keys Learning will consider making a referral to the National College for Teaching and Leadership (NCTL) as required by sections 141D and 141E of the Education Act 2002. A prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

Should historical allegations of child abuse be made against a teacher who is no longer teaching, Cross Keys Learning will, in accordance with 'Keeping Children Safe in Education 2020', report the matter to the police. All allegations of historical abuse should be referred to the Head Teacher or DSL straight away.

When a third party or agency on or off the school site delivers services, Cross Keys Learning obtain written assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements. The school will check that any person presenting him or herself for work is the same person on whom the checks have been made.

## **19. The use of school premises by other organisations**

Where services or activities are provided separately by another body using the Cross Keys Learning school premises, the Headteacher or Operations Manager will seek assurance that the organisation concerned has appropriate policies and procedures in place about safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers. If assurance is not achieved, an application to use premises may be refused.

## **20. Security**

All staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole-school community ethos and welcome comments from students, parents and others about areas that may need improvement as well as what we are doing well.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the visitors log and to display a visitor's badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance. The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

## **21. Other safeguarding issues – The Wider Agenda**

Safeguarding issues can manifest themselves in many ways and can often overlap with one another. Some behaviours linked to drug taking, alcohol abuse, truancy, gender-based violence and sexting put students in danger.

### **Sexting**

Sexting can be defined as 'an increasingly common activity among children and young people, where they share inappropriate or explicit images online...' This can include sharing indecent images of themselves or others via mobile phones, webcams, social media, and instant messaging. Although viewed by many young people as 'normal' and part of 'flirting', by sending an explicit image, a young person is producing and distributing child images and risks being prosecuted, even if the picture is taken and shared with their permission. They can be at increased risk of blackmail, bullying, emotional distress, and unwanted attention. Whilst it is usually more common with teenagers, sexting behaviour can affect younger children, for example risk taking behaviour or natural curiosity. (NSPCC).

Our approach to sexting is that any disclosure of sexting made to a member of staff is immediately reported to the DSL. If a device is referred to it must be removed from the student having been switched off immediately, it is then handed to the DSL. Staff are aware that if a student discloses that they have sent or received a 'sex' then these images should not be printed, copied or forwarded.

### **Peer on Peer Abuse**

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to:

- bullying (including cyberbullying);
- "Upskirting" typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- gender-based violence
- sexting (also known as youth produced sexual imagery); and
- initiation-type violence and rituals.

Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At Cross Keys Learning we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.

The allegation:

- is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students in the school
- indicates that other students may have been affected by this student
- indicates that young people outside the school may be affected by this student

### **Sexting**

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In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'.

### **Radicalisation**

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

### **Recognising Extremism**

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

The Home Office statutory Prevent duty guidance can be accessed via:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445977/3799\\_Revised\\_Prevent\\_Duty\\_Guidance\\_\\_England\\_Wales\\_V2-Interactive.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance__England_Wales_V2-Interactive.pdf)

### **Children Missing from Education**



Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2020) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

### **Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);



- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

### **Child Criminal exploitation**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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

### **County Lines**

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

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

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

### **Female Genital Mutilation**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

#### **Risk factors for FGM include:**

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a ‘special’ procedure to become a woman

#### **Indications that FGM may have already taken place may include:**

- Difficulty walking, sitting or standing and may even look uncomfortable;
- Spending longer than normal in the bathroom or toilet due to difficulties urinating;
- Spending long periods away from a classroom with bladder or menstrual problems;
- Frequent urinary, menstrual or stomach problems;
- Prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl’s return;
- Reluctance to undergo normal medical examinations;
- Confiding in a professional without being explicit due to embarrassment or fear;
- Talking about pain or discomfort between her legs.

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

The mandatory reporting duty does not apply to teaching assistants; however, the school policy is that anyone who has concerns needs to discuss these with the DSL.

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

The local police non-emergency number is 101.

### **Domestic abuse**

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.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

### **So-Called 'Honour Based' Violence ('HBV')**

So-called HBV encompasses crimes, which have been committed to protect or defend the honour of the family / community and can include forced marriage, Female Genital Mutilation ('FGM') and practices such as breast ironing. All forms of HBV are abuse and will be handled and escalated as such. Staff will be alert to possible indicators of HBV - Guidance available via:

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation> and <https://www.gov.uk/guidance/forced-marriage>

### **Bullying** (Refer to Anti-Bullying Policy)

While bullying between students is not a separate category of abuse and neglect, it is a very serious issue can cause considerable anxiety and distress. Bullying can have a disastrous effect on a student's well-being. In very rare cases, it has been a feature in suicides.

All incidences of bullying, including cyber-bullying and prejudice-based bullying are reported and managed through our anti-bullying procedures. The subject of bullying is addressed at regular intervals through tutor time and in PSHE.

If the bullying is particularly serious, or the anti-bullying procedures are deemed ineffective, the Head Teacher and the DSL will consider implementing Early Help or child protection procedures.

### **Students with sexually harmful or inappropriate behaviour**

Cross Keys Learning acknowledge that other children or young people may harm students. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures as above where necessary. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures.

Members of staff who become concerned about a student's sexual behaviour, including any known online sexual behaviour, should speak to the DSL as soon as possible. The management of students with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. We recognise that students who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

Any instances of sexual harm caused by one student to another and any situation where there are concerns about power imbalance, coercion or force will be discussed with Children's Social Care. The school will also be informed by the Police or Children's Social Care about referrals made directly to those agencies from other sources (e.g. family members, family friends, parents of other children) in

relation to alleged sexualised inappropriate or sexually abusive behaviour displayed by students inside and/or outside school.

In all such circumstances, the school may be required to attend a strategy meeting under multiagency child protection procedures in order to facilitate risk management and planning with other agencies.

### **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Cross Keys Learning recognise that whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

We have a mandatory duty to report to the local authority where we are aware or suspect that a student is subject to a private fostering arrangement. Although we have a duty to inform the local authority, there is no duty for anyone, including that of the private foster carer or social workers to inform the school. As a school we do need to be clear who has parental responsibility.

Staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the student involved to check that they are aware of their duty to inform the local authority. As a school, we have a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the student who is being registered.

### **Use of images (Refer to Use of Images Policy)**

Photographs are only taken of students with their parents / carers' permission (provided in writing via consent form). Where photographs are taken by staff to give evidence of student's progress, photos should normally be taken using school cameras. Where this is not the case and a member of staff uses their own device, the image will be downloaded onto the school system at the earliest opportunity, and deleted from the device. All photos will be downloaded onto school computers, where they will be monitored. Photos will not be used or passed on outside the school.

### **Students who maybe vulnerable**

Some students are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability such as societal attitudes and assumptions including prejudice and discrimination; child protection procedures that are inadequately responsive to children's diverse

circumstances; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; as well as an individual child's personality, behaviour, disability and family circumstances.

To ensure that all of our students receive equal protection, we will consider those who are:

- Disabled or have special educational needs
- Young carers
- Affected by parental substance misuse, domestic violence or parental mental health needs
- Asylum seekers
- Looked after by the Local Authority or otherwise living away from home
- Vulnerable to being bullied, or engaging in bullying behaviours
- Living in temporary accommodation
- Living transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of child sexual exploitation (CSE)
- Do not have English as a first language
- At risk of female genital mutilation (FGM)
- At risk of forced marriage
- At risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive.

### **Special Educational Needs**

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;

children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and

difficulties may arise in overcoming communication barriers.

At Cross Keys Learning we identify Students who might need more support to be kept safe or to keep themselves safe by:

- Staff supporting such students in expressing any concerns they may have
- Staff will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.
- Under no circumstances will assumptions be made that indicators of possible abuse such as behaviour, mood or injury relate to the student's disability without further exploration.

### **Children in Care**

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe and ensures that appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the

child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual head for children in care.

### **Children who have a Social Worker**

At Cross Keys Learning, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

The School Leaders will ensure that there is regular communication with the Child's Social Worker to ensure the key areas of concern, development and positive changes are shared and discussed and actions agreed for continued support.

### **Mental Health**

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

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy. This can be done by completing a concern form or Safeguarding Green form which is submitted to the DSL as soon as possible.

Mental illness in a parent or carer does not necessarily have an adverse impact on a student, but it is essential always to assess its implications for any children in the family. Parental illness may markedly restrict student's social and recreational activities. Where a parent is suffering from a mental or physical illness, students may have caring responsibilities placed upon them inappropriate to their years. If they are depressed, parents may neglect their own and their children's physical and emotional needs. In some circumstances, some forms of mental illness may blunt parents' emotions and feelings or cause them to behave towards their children in bizarre or violent ways. Students most at risk of significant harm are those involved in parental delusions, and students who become targets for parental aggression or rejection, or who are neglected as a result of the parent's illness.

### **Students wishes**

Where there is a safeguarding concern Learning Cross Keys Learning will ensure the student's wishes and feelings are considered when determining what action to take and what services to provide. We manage this by ensuring the student has an appropriate person with whom they can discuss their needs and wishes. Cross Keys Learning will always operate processes with the best interests of the student as the determining factor.

## **22. Complaints about this policy**

If parents/guardians are dissatisfied with any aspect of the Cross Keys Learning Safeguarding policy, they are encouraged to communicate this to the Cross Keys Learning Operational Manager in the first instance.

