

Fair Ways Education

Safeguarding Policy

Document Ref:	Version No:	Summary of Changes:	Author	Release Date:	Approved By:
SC10	1	For history of changes Versions 1-8 please refer to table at the end of this policy	Gareth Webb	December 2015	QGSC
SC10	9	Updated name and roles point 2.2	Laura Rowe	January 2020	PSC
SC10	10	Added appendix A: COVID 19 School closure arrangements	Laura Rowe	April 2020	PSC
SC10	11	Amended Safeguarding Lead on Appendix A	Laura Rowe	June 20	PSC
SC10	12	Update to include KCSiE 2020 changes	Laura Rowe	September 2020	PSC
SC11	13	Amendment to names	Laura Rowe	January 2021	PSC
SC11	14	Annual review 2021/22	Laura Rowe	November 2021	PSC
SC11	15	Changes to DSLs	Laura Rowe	March 2022	PSC

(for anything related to versions 2-8 please see appendix A)

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Fair Ways Vision, Mission and Values

Our vision

To build an institution that makes a difference to society and leaves a legacy greater than ourselves and our contributions.

Our mission

Making a difference through passionate care, support and education.

Our values

As a charity we measure our wealth by the difference we make, rather than any profit.

We believe that by embodying a culture in which every individual is valued for their own contribution, we can develop them and harness their potential, so that they may achieve great things.

Our values form the heart of the work we do, defined by Fair Ways people, for Fair Ways people. These are the values by which we operate, by which we are governed, and to which we are held accountable.

We therefore expect every individual within the organisation to *play their part*:

P ROFESSIONAL ATTITUDE	A CCEPTING	R EFLECTIVE	T RANSSPARENT
<ul style="list-style-type: none"> We do what we say we will We approach challenges with optimism and enthusiasm We don't judge, we notice We put the needs of the service before our own personal gains 	<ul style="list-style-type: none"> We don't give up on people We value all individuals and are willing to challenge them We embrace each other's differences as much as our similarities We accept responsibility for our actions 	<ul style="list-style-type: none"> We give feedback, we invite feedback, we listen to feedback We look inward before we look outward We learn as much from our mistakes as from our successes We listen to each other, learn from each other and grow together 	<ul style="list-style-type: none"> We are always willing to explain why We have the courage to be open and honest We earn trust through our transparency We live by our values even when no-one is watching

Policy Statement

Safeguarding determines the actions that we take to keep children safe and protect them from harm in all aspects of their school life. As a school we are committed to safeguarding and promoting the welfare of all of our pupils.

The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the school. As such, this overarching policy will link to other policies which will provide more information and greater detail.

1 Safeguarding Definitions

Within Keeping Children Safe in Education (2021), Working together to safeguard children (2018) and the Ofsted inspection guidance (2019), there are a number of safeguarding areas directly highlighted or implied within the text.

These areas of safeguarding have been separated into issues that are emerging or high risk issues (3); those related to the pupils as an individual (4); other safeguarding issues affecting pupils (5); and those related to the running of the school (6).

Within this document:

'Safeguarding' is defined in the Children Act 2004 as protecting from maltreatment; preventing impairment of health and development; ensuring that children grow up with the provision of safe and effective care; and work in a way that gives the best life chances and transition to adulthood. Our safeguarding practice applies to every child.

The term **Staff** applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

Child refers to all young people who have not yet reached their 18 birthday. On the whole, this will apply to pupils of our school; however the policy will extend to visiting children and students from other establishments.

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, guardians, step parents and foster carers.

2 Introduction

2.1 Safeguarding is everyone's responsibility. As such it does not rest with the Designated Safeguarding Lead (DSL) and their deputies to take a lead responsibility in all of the areas covered within this policy.

2.2 Safeguarding processes are intended to put in place measures that minimise harm to children. There will be situations where gaps or deficiencies in the policies and processes we have in place will be highlighted. In these situations a review will be carried out in order to identify learning and inform the policy, practice and culture of the school.

2.3 Safeguarding and promoting the welfare of children is defined 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
- Taking action to enable all children to have the best outcomes

2.4 All young people in our school are able to talk to any member of staff to share concerns or talk about situations which are giving them worries. The staff will listen to the young person, take their worries seriously and share the information with the designated safeguarding lead.

2.5 In addition we provide young people with information of who they can talk to outside of school both within the community and with local or national organisations who can provide support or help.

2.6 As a school, we review this policy at least annually in line with Department of Education and Local Safeguarding Childrens Partnerships.

3 The Role of school and college staff

3.1 All school staff play an important part in Safeguarding as they are in a position to identify concerns early, provide help for the young people in the school and prevent concerns from escalating.

- 3.2 All staff in the school are responsible for providing a safe environment in which children can learn and be educated.
- 3.3 Each school and school site has a designated safeguarding lead (and deputies) who provide support to staff to carry out their safeguarding duties and who liaise closely with other relevant services.
- 3.4 The designated safeguarding leads (and deputies) are:

School DSLs

- Laura Rowe Director of Education
- Victoria Horner Head of School, GLADE School

Deputy School DSL

- Sophie Owen Deputy Head, GLADE
- Charlotte Leech Deputy Head, Fair Ways - Swanwick
- Thomas Backaller Deputy Head, Fair Ways – Fort Wallington
- Alex Richards Curriculum Manager, GLADE
- Charlotte McKearnan Pastoral Manager, GLADE
- Lorrie Schulman Curriculum Manager, Fair Ways – Fort Wallington
- Danielle Cheyney Pastoral Manager, Fair Ways – Swanwick

Laura Rowe, Director of Education has oversight of Safeguarding across Fair Ways Education.

- 3.5 All staff receive appropriate safeguarding and child protection training on a regular basis, as well as, any relevant updates.

4 Abuse and Neglect

4.1 All staff are aware of indicators of abuse and neglect so that they can identify cases and young people who may be in need of help or protection. If any staff are unsure, they are aware that they should speak to the school designated safeguarding lead.

4.2 All staff are aware that abuse, neglect and safeguarding issues are rarely stand-alone events. In most cases, multiple issues will overlap with one another.

4.3 Indicators of abuse and neglect:

4.3.1 Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children maybe abused in a family

- or institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- 4.3.2 **Physical Abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 4.3.3 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 4.3.4 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
- 4.3.5 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or

abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

5 Safeguarding Issues

5.1 All Fair Ways staff are aware of safeguarding issues what can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting put the schools young people in danger.

5.2 Child Exploitation

5.2.1 Child Exploitation is a form of abuse and occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

5.3 Child on Child Sexual Violence and Sexual Harassment

5.3.1 Fair Ways has a separate policy which manages the processes involved in Allegations of Peer on Peer abuse.

5.4 Children missing from education

5.4.1 Patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns.

5.4.2 DSLs and staff should consider:

- **Missing lessons:** Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the child remain on the school site or are they absent from the site? Is the child being sexually exploited during this time? Are they late because of a caring responsibility? Have they been directly or indirectly affected by substance misuse? Are other pupils routinely missing the same lessons, and does this raise other risks or concerns? Is the lesson being missed one that would cause bruising or injuries to become visible?
 - **Single missing days:** Is there a pattern in the day missed? Is it before or after the weekend suggesting the child is away from the area? Are there specific lessons or members of staff on these days? Is the parent informing the school of the absence on the day? Are missing days reported back to parents to confirm their awareness? Is the child being sexually exploited during this day? Do the parents appear to be aware? Are the pupil's peers making comments or suggestions as to where the pupil is at?
 - **Continuous missing days:** Has the school been able to make contact with the parent? Is medical evidence being provided? Are siblings attending school (either our or local schools?) Did we have any concerns about radicalisation, FGM, forced marriage, honour based violence, sexual exploitation? Have we had any concerns about physical or sexual abuse?
- 5.4.3 The school will view absence as both a safeguarding issue and an educational outcomes issue. The school may take steps that could result in legal action for attendance, or a referral to children's social care, or both.
- 5.5 Contextual Safeguarding**
- 5.5.1 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of school and/or can occur between young people outside of school. All staff, but especially the designated and deputy safeguarding leads should consider whether children are at risk of abuse or exploitation in situations outside their families.
- 5.5.2 Risk and harm outside of the family can take a variety of different forms and children can be vulnerable to sexual exploitation, criminal exploitation, and serious youth violence in addition to other risks.
- 5.5.3 For us as an education provider, we will consider the various factors that have an interplay with the life of any young person about whom we have concerns within the school and the level of influence that these factors have on their ability to be

protected and remain free from harm particularly when it comes to child exploitation or criminal activity.

5.6 Extra Familiar Harm

5.6.1 Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college or home. This has been known as contextual safeguarding, which simply means assessments of young people should consider whether wider environmental factors are present in a young person's life that are a threat to their safety and/or welfare.

5.7 County Lines

5.7.1 Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults.
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

5.7.2 If staff believe that a child is being trafficked, this will be reported to the designated safeguarding lead for referral to be considered to children's social care and the police.

5.8 Domestic Abuse

5.8.1 Domestic abuse is any incident or pattern of incidents of controlling, coercive or 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. This can encompass, but is not limited to, the following types of abuse:

- psychological
- physical
- sexual
- financial
- emotional

5.8.2 Controlling behaviour is a range of acts designed to make a person subordinate and / or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

5.8.3 Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

5.8.4 Research indicates that living within a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of what a normal relationship is.

5.8.5 Children witnessing domestic abuse is recognised as ‘significant harm’ in law. These children may become aggressive; display anti-social behaviours; suffer from depression or anxiety; or fail to reach their educational potential.

5.8.6 Indicators that a child is living within a relationship with domestic abuse include: withdrawn, suddenly behaves differently, anxious, clingy, depressed, aggressive, problems sleeping, eating disorders, wets the bed, soils clothes, takes risks, misses school, changes in eating habits, obsessive behaviour, nightmares, drugs, alcohol, self-harm, thoughts about suicide

5.8.7 These behaviours themselves do not indicate that a child is living with domestic abuse, but should be considered as indicators that this may be the case.

5.8.8 If staff believe that a child is living with domestic abuse, this will be reported to the designated safeguarding lead for referral to be considered to children’s social care.

5.9 Female Genital Mutilation (‘Honour-based’ abuse)

5.9.1 Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession,

discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

5.10 Forced Marriage ('Honour-based' abuse)

5.10.1 In the case of children: *'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.'* In developing countries 11% of girls are married before the age of 15. One in three victims of forced marriage in the U.K. are under 18.

5.10.2 It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice.

5.10.3 Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care.

5.10.4 Policies and practices in this school reflect the fact that while all members of staff, including teachers, have important responsibilities with regard to pupils who may be at risk of forced marriage, teachers and school leaders should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as police officers or social workers.

5.10.5 Characteristics that may indicate forced marriage. While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including: An extended absence from school / college, including truancy, a drop in performance or sudden signs of low motivation, excessive parental restriction and control of movements, a history of siblings leaving education to marry early, poor performance, parental control of income and students being allowed only limited career choices, evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse and / or evidence of family disputes / conflict, domestic violence / abuse or running away from home.

5.10.6 On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

5.11 Honour Based Violence ('Honour Based' abuse)

5.11.1 Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

5.11.2 It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour based violence might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion.
- Want to get out of an arranged marriage.
- Want to get out of a forced marriage.
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.
- Convert to a different faith from the family.

5.11.3 Women and girls are the most common victims of honour based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include: domestic abuse, threats of violence, sexual or psychological abuse, forced marriage, being held against your will or taken somewhere you don't want to go, assault.

5.11.4 If staff believe that a young person is at risk from honour based violence the DSL will follow the usual safeguarding referral process. However, if it is clear that a crime has been committed or the pupil is at immediate risk the police will be contacted in the first place. It is important that if honour based violence is known or suspected that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

5.12 Mental Health

5.12.1 All staff 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe the young people 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.

5.12.2 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

5.12.3 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

5.13 Missing, Exploited and Trafficked Children (MET)

5.13.1 Within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or being sexually exploited; or who are at risk of or are being trafficked. Given the close links between all of these issues, there has been a considered response to join all three issues so that cross over of risk is not missed.

5.14 Parental mental health

5.14.1 The term "mental ill health" is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent / carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

5.14.2 For children the impact of parental mental health can include: parent / carer's needs or illnesses taking precedence over the child's needs, child's physical and emotional needs neglected, child acting as a young carer for a parent or a sibling, child having restricted social and recreational activities, child finds it difficult to concentrate-impacting on educational achievement, a child missing school regularly as (s) he is being kept home as a companion for a parent / carer, adopt paranoid or suspicious behaviour as they believe their parent's delusions, witnessing self-harming behaviour and suicide attempts (including attempts that involve the child), obsessional compulsive behaviours involving the child.

5.14.3 If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to children's social care.

5.15 Parental Substance misuse

5.15.1 Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.

- 5.15.2 Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.
- 5.15.3 For children the impact of parental substance misuse can include: inadequate food, heat and clothing for children (family finances used to fund adult's dependency), lack of engagement or interest from parents in their development, education or wellbeing, behavioural difficulties- inappropriate display of sexual and / or aggressive behaviour, bullying (including due to poor physical appearance), isolation – finding it hard to socialise, make friends or invite them home, tiredness or lack of concentration, child talking of or bringing into school drugs or related paraphernalia, injuries / accidents (due to inadequate adult supervision), taking on a caring role, continued poor academic performance including difficulties completing homework on time, poor attendance or late arrival.
- 5.15.4 These behaviours themselves do not indicate that a child's parent is misusing substances, but should be considered as indicators that this may be the case.
- 5.15.5 If staff believe that a child is living with parental substance misuse, this will be reported to the designated safeguarding lead for referral to be considered for children's social care.

5.16 **Child on Child Abuse**

- 5.16.1 All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:
- Bullying (including cyberbullying);
 - Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - Sexual violence, such as rape, assault by penetration and sexual assault;
 - Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
 - Upskirting, which 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;
 - Sexting (also known as youth produced sexual imagery); and
 - Initiation/hazing type violence and rituals.

5.17 Preventing Radicalisation and Extremism

5.17.1 The prevent duty requires that all staff are aware of the signs that a child may be vulnerable to radicalisation. The risks will need to be considered for political; environmental; animal rights; or faith based extremism that may lead to a child becoming radicalised. All staff have undertaken e-learning training / received awareness training in order that they can identify the signs of children being radicalised.

5.17.2 As part of the preventative process resilience to radicalisation will be built through the promotion of fundamental British values through the curriculum.

5.17.3 Any child who is considered vulnerable to radicalisation will be referred by the DSL to Hampshire children's social care, where the concerns will be considered in the MASH process. If the police prevent officer considers the information to be indicating a level of risk a "channel panel" will be convened and the school will attend and support this process.

5.18 Serious Crime

5.18.1 All staff are aware of indicators, which may signal that young people are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs (DfE, 2019a).

5.18.2 All staff are aware of the associated risks and understand the measures in place to measure these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults: county lines guidance (DfE, 2019a).

5.19 Serious Violence

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

5.20 Trafficked Children

5.20.1 Human trafficking is defined by the UNHCR in respect of children as a process that is a combination of:

- Movement (including within the UK.)
- For the purpose of exploitation.

5.20.2 Any child transported for exploitative reasons is considered to be a trafficking victim. There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

5.20.3 There are a number of indicators which suggest that a child may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows: shows signs of physical or sexual abuse, and / or has contracted a sexually transmitted infection or has an unwanted pregnancy, has a history with missing links and unexplained moves, is required to earn a minimum amount of money every day, works in various locations, has limited freedom of movement, appears to be missing for periods, is known to beg for money, is being cared for by adult(s) who are not their parents and the quality of the relationship between the child and their adult carers is not good, is one among a number of unrelated children found at one address, has not been registered with or attended a GP practice, is excessively afraid of being deported.

5.20.4 For those children who are internally trafficked within the UK indicators include: physical symptoms (bruising indicating either physical or sexual assault), prevalence of a sexually transmitted infection or unwanted pregnancy, reports from reliable sources suggesting the likelihood of involvement in sexual exploitation / the child has been seen in places known to be used for sexual exploitation, evidence of drug, alcohol or substance misuse, being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people, relationship with a significantly older partner, accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding, persistently missing, staying out overnight or returning late with no plausible explanation, returning after having been missing, looking well cared for despite having not been at home, having keys to premises other than those known about, low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity, truancy / disengagement with education, entering or leaving vehicles driven by unknown adults, going missing and being found in areas where the child or young person has no known links, possible inappropriate use of the internet and forming on-line relationships, particularly with adults.

5.20.5 These behaviours themselves do not indicate that a child is being trafficked, but should be considered as indicators that this may be the case.

5.20.6 If staff believe that a child is being trafficked, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.

6 Safeguarding issues relating to individual pupil needs

6.1 **Pupils with medical conditions (in school);** There is a separate policy outlining the school's position on this – Medication, First Aid and Intimate care policy.

6.1.1 As a school we will make sure that sufficient staff are trained to support any pupil with a medical condition.

6.1.2 All relevant staff will be made aware of the condition to support the child and be aware of medical needs and risks to the child.

6.1.3 An individual healthcare plan may be put in place to support the child and their medical needs.

6.2 **Pupils with medical conditions (out of school)**

6.2.1 There will be occasions when children are temporarily unable to attend our school on a full time basis because of their medical needs. These children and young people are likely to be:

- Children and young people suffering from long-term illnesses.
- Children and young people with long-term post-operative or post-injury recovery periods.
- Children and young people with long-term mental health problems (emotionally vulnerable.)

6.2.2 Where it is clear that an absence will be for more than 15 continuous school days, the Education and Inclusion Service will be contacted to support with the pupil's education.

6.3 **Intimate care**

6.3.1 Fair Ways School adopts the good practice guidelines for intimate care taken from Chailey Heritage Education Centre, suggested through the Hampshire Local Safeguarding Children Partnership (LSCP). The guidelines are viewed as expectations for staff and designed to protect both children and staff alike. Parents / carers will be made aware of how intimate care for their child will be managed. Staff are

advised if they are not comfortable with any aspect of these guidelines they should seek advice from the Deputy Head or Head of School.

- 6.3.2 Staff will treat every child with dignity and respect and ensure privacy appropriate to the child age and the situation. Privacy is important and much intimate care is carried out by one staff member alone. The LSCB actively support this practice unless the task requires two staff. Where possible the intimate care should be carried out by someone chosen by the child. For older children it is preferable the member of staff is the same gender.
- 6.3.3 Staff will involve the child as far as possible in his or her own intimate care and always try and promote independence. Staff will try and avoid doing things for the child they can do by themselves. This is as important for tasks such as removing underclothes as it is for washing private parts of a child's body. If the child is verbal always give them choices where possible.
- 6.3.4 The staff will be responsive to the child's reactions and ask questions throughout – is it ok to do this? Can you wash there? If a child expresses a dislike to a staff member doing their intimate care, try and find out why. Conversely if a child has a 'grudge' against you or dislikes you, make sure the Deputy Head and Head of School are aware of this.
- 6.3.5 Staff will make sure they use a consistent approach as much as possible. For example use a flannel to wash private parts rather than bare hands.
- 6.3.6 Staff will never do anything unless they know how to do it correctly and training will be sourced if needed.
- 6.3.7 If staff are concerned that during the intimate care of a child they accidentally hurt them, child seems sexually aroused, child misunderstands or misinterprets something or has a very emotional reaction, they will report this immediately to another person working with them at the time. The staff member will make a brief written note and report to the Deputy Head and Head of School.
- 6.3.8 Staff will be vigilant for children that require intimate care as they are more vulnerable to abuse and will report any concerns in line with the Child Protection Policy.

The above is taken largely from the publication 'Abuse and children who are disabled: a training and resource pack for trainers in child protection and disability, 1993'

6.4 **Fabricated or induced illness**

6.4.1 There are three main ways that a carer could fabricate or induce illness in a child. These are not mutually exclusive and include:

- Fabrication of signs and symptoms. This may include fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents.
- Induction of illness by a variety of means.

6.4.2 If we are concerned that a child may be suffering from fabricated or induced illness we will follow the established procedures of the Hampshire Safeguarding Children Partnership.

7 Other Safeguarding issues impacting pupils.

7.1 **Bullying:** the school works to a separate bullying policy

7.2 **Prejudice based abuse:** Prejudice based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice based on a person's real or perceived:

- disability
- race
- religion
- gender identity
- sexual orientation

7.3 **Drugs and substance misuse:** the school works to a separate drug management policy.

7.4 **Faith Abuse:** The number of known cases of child abuse linked to accusations of "possession" or "witchcraft" is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem. Such abuse generally occurs when a carer views a child as being "different", attributes this difference to the child being "possessed" or involved in "witchcraft" and attempts to exorcise him or her.

7.5 **Private Fostering:** Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or more. The Law requires that the carers and parents must notify the children's services department of any private fostering arrangement.

- 7.6 **Parenting:** Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care or medical treatment places the child(ren) in situations of risk or harm. In situations where parents struggle with tasks such as setting boundaries and providing appropriate supervision, timely interventions can make drastic changes to the wellbeing and life experiences of the child(ren) without the requirement for a social work assessment or plan being in place.

8 Technology

- 8.1 Technological hardware and software is developing continuously with an increase in functionality of devices that people use. The majority of children use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. While technology itself is not harmful, it can be used by others to make children vulnerable and to abuse them.

- 8.2 **Online Safety:** With the current speed of on-line change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. Some of the risks could be:

- Unwanted contact.
- Grooming.
- Online bullying including sexting.
- Digital footprint.

- 8.2.1 The school will therefore seek to provide information and awareness to both pupils and their parents through:

- Acceptable use agreements for children, teachers, parents / carers.
- Curriculum activities involving raising awareness around staying safe online.
- Information included in letters, newsletters, website.
- Parents evenings / sessions.
- High profile events / campaigns e.g. Safer Internet Day.
- Building awareness around information that is held on relevant websites and / or publications.

- 8.3 **Social Media:** With the current speed of on-line change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and

inappropriate material on the internet and may be unsure about how to respond. Some of the risks could be:

- Unwanted contact.
- Grooming.
- Online bullying including sexting.
- Digital footprint/

8.3.1 The school will therefore seek to provide information and awareness to both pupils and their parents through:

- Acceptable use agreements for children, teachers, parents / carers and governors.
- Curriculum activities involving raising awareness around staying safe online.
- Information included in letters, newsletters, website.
- Parents evenings / sessions.
- High profile events / campaigns e.g. Safer Internet Day.
- Building awareness around information that is held on relevant websites and / or publications.
- E-Safety policy.

8.4 **Cyberbullying:** Central to the School's anti-bullying policy should be the principle that *'bullying is always unacceptable'* and that *'all pupils have a right not to be bullied'*.

8.4.1 The school should also recognise that it must take note of bullying perpetrated outside school which spills over into the school and so we will respond to any cyber-bullying we become aware of carried out by pupils when they are away from the site.

8.4.2 Cyber-bullying is defined as "an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself / herself."

8.4.3 By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile phones.
- The use of mobile phone cameras to cause distress, fear or humiliation.
- Posting threatening, abusive, and defamatory or humiliating material on websites, to include blogs, personal websites, and social networking sites.
- Using e-mail to message others.
- Hijacking / cloning email accounts.
- Making threatening, abusive and defamatory or humiliating remarks in on-line forums.

- 8.4.4 Cyber-bullying may be at a level where it is criminal in character.
- 8.4.5 It is unlawful to disseminate defamatory information in any media including internet sites.
- 8.4.6 Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.
- 8.4.7 The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.
- 8.4.8 If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. The school will pass on information to the police if it feels that it is appropriate or are required to do so.
- 8.5 **Sexting:** 'Sexting' often refers to the sharing of naked or 'nude' pictures or video through mobile phones and the internet. It also includes underwear shots, sexual poses and explicit text messaging.
- 8.5.1 While sexting often takes place in a consensual relationship between two young people, the use of Sexted images in revenge following a relationship breakdown is becoming more commonplace. Sexting can also be used as a form of sexual exploitation and take place between strangers.
- 8.5.2 As the average age of first smartphone or camera enabled tablet is 6 years old, sexting is an issue that requires awareness raising across all ages.
- 8.5.3 The school will use age appropriate educational material to raise awareness, to promote safety and deal with pressure. Parents should be aware that they can come to the school for advice.
- 8.6 **Gaming:** Online gaming is an activity that the majority of children and many adults get involved in. The school will raise awareness:
- By talking to parents and carers about the games their children play and help them identify whether they are appropriate.
 - By support parents in identifying the most effective way of safeguarding their children by using parental controls and child safety mode.
 - By talking to parents about setting boundaries and time limits when games are played.

- By highlighting relevant resources.
- 8.7 **Online Reputation:** Online reputation is the opinion others get of a person when they encounter them online. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and staff are aware that anything that is posted could influence their future professional reputation. The majority of organizations and work establishments now check digital footprint before considering applications for positions or places on courses.
- 8.8 **Online Grooming:** Online grooming is the process by which one person with an inappropriate sexual interest in children will approach a child online, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.
- 8.8.1 The school will build awareness amongst children and parents about ensuring that the child: only has friends online that they know in real life, is aware that if they communicate with somebody that they have met online, that relationship should stay online.
- 8.8.2 That parents should: recognise the signs of grooming, have regular conversations with their children about online activity and how to stay safe online.
- 8.8.2 The school will raise awareness by: running sessions for parents, include awareness around grooming as part of their curriculum, identifying with both parents and children how they can be safeguarded against grooming.

9 Reporting a Concern

- 9.1 Where staff have a concern about a child, they should contact the DSL, school management and record on Clear Care (where possible). All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing.
- 9.2 Staff are reminded of the need to report any concern immediately and without delay.
- 9.3 Where staff are concerned about an adult working with children in the school, they should report the concern to the Head of School immediately. If there is cause to make a notification to the Head of School whilst away from school, this should be done by telephone. Staff must not just leave an answerphone message. If the Head of School is not contactable, the member of staff should contact either a deputy DSL or the Deputy Head.

- 9.4 Concerns about the Head of School should be directed to Laura Rowe, Deputy Director of Education.
- 9.5 If LADO need to be contacted, please email child.protection@hants.gov.uk with name, organisation and telephone so the team can call you.

10 The use of 'reasonable force' in school

- 10.1 There are circumstances when it is appropriate for staff at school to use reasonable force to safeguard young people.
- 10.2 Fair Ways operates a separate policy outlining how we will use physical intervention.

11 Safer Recruitment

- 11.1 The school operates a separate safer recruitment process as part of the Fair Ways Recruitment Policy. On all recruitment panels there is at least one member who has undertaken safer recruitment training.
- 11.2 The process checks the identity, criminal record (enhanced DBS), mental and physical capacity, right to work in the U.K., professional qualification and seeks confirmation of the applicant's experience and history through references.
- 11.3 The DSL or their deputy will provide all new staff with training to enable them to both fulfil their role and also to understand the child protection policy, the safeguarding policy, the staff behaviour policy / code of conduct, and part one of Keeping Children Safe in Education.
- 11.4 This induction may be covered within the annual training if this falls at the same time; otherwise it will be carried out separately during the initial starting period.

12 Disqualification under the Childcare Act

- 12.1 The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare.
- 12.2 Staff (meaning individuals employed by the school or local authority, those undertaking training in schools (both salaried and unsalaried), casual workers and volunteers) are covered by this legislation in the following circumstances:

- They are employed and / or provide early years' childcare (this covers the age range from birth until 1 September following a child's fifth birthday, i.e. up to and including reception age). This includes education in nursery and reception classes (e.g. teachers and support staff in a reception class) and / or any supervised activity (such as breakfast clubs, lunchtime supervision and after school care provided by the school), both during and outside of school hours for children in the early years age range.
- They work in childcare provided by the school outside of school hours for children who are above reception age but who have not attained the age of 8. This includes before school settings, such as breakfast clubs, after school provision and holiday clubs. It does NOT include education or supervised activity for children above reception age during school hours including extended school hours for co-curricular learning activities, such as the school's choir or sports teams.

12.3 The legislation also applies to any staff directly concerned in the management of such early or later years' provision.

12.4 As a school we require all staff who may be impacted by this piece of legislation to complete a self-declaration form and to inform the Head teacher immediately if they become aware of any changes to their circumstances that would require us to be aware.

12.5 If a waiver is not granted we will seek advice from our HR provider and / or the LADO as to how risk is most effectively managed.

13 Health and Safety

13.1 The site, the equipment and the activities carried out as part of the curriculum are all required to comply with the Health and Safety at Work act 1974 and regulations made under the act.

13.2 All risks are required to be assessed and recorded plans of how to manage the risk are in place. The plans should always take a common sense and proportionate approach to allow activities to be safe rather than preventing them from taking place. The school has a Health and Safety policy which details the actions that we take in more detail.

14 Site Security

14.1 We aim to provide a secure site, but recognise that the site is only as secure as the people who use it. Therefore all people on the site have to adhere to the rules which govern it. These are:

- All gates are locked except at the start and end of the school day.
- Doors are kept closed to prevent intrusion.
- Visitors and volunteers enter at the reception and must sign in.
- Visitors and volunteers are identified by (means of identification.)
- Children are only allowed home during the school day with adults / carers with parental responsibility or permission being given.
- All children leaving or returning during the school day have to sign out and in.
- Empty classrooms have windows closed.

15 Off site visits

15.1 A particular strand of health and safety is looking at risks when undertaking off site visits. Some activities, especially those happening away from the school and residential visits, can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment may be all that is needed. If it is a new activity, a visit involving adventure activities, residential, overseas or an 'Open Country' visit, a specific assessment of significant risks must be carried out. The school has access to Fair Ways Head of Health and Safety advisor who liaises with our external partner, Peninsula, who helps colleagues in schools to manage risks and support with off site visits and provides training in the management of groups during off site visits, as well as First Aid in an outdoor context.

16 First Aid

16.1 There is a separate First Aid policy.

17 Taking and the use and storage of images

17.1 As a school we will seek consent from the parent of a pupil and from teachers and other adults before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in school publications, printed media or on electronic publications.

17.2 We will not seek consent for photos where you would not be able to identify the individual.

17.3 We will seek consent for the period the pupil remains registered with us and, unless we have specific written permission we will remove photographs after a child (or teacher) appearing in them leaves the school or if consent is withdrawn.

- 17.4 Photographs will only be taken on school owned equipment and stored on the school network. No images of pupils will be taken or stored on privately owned equipment by staff members.

18 Covid-19

- 18.1 Fair Ways continues to deliver education to all young people during the Corona pandemic.
- 18.2 All young people have been risk-assessed in consultation with the local authority and parents, to ensure that they are safe to attend school or need to be considered for blended learning.
- 18.3 Attendance will continue to be monitored as normal, with additional information being sent to the Department of Education daily and local authorities as requested.
- 18.4 There will also be a named Designated Safeguarding Lead at each school and school site to ensure safeguarding continues to be managed in a timely manner.
- 18.5 All safeguarding concerns including staffing concerns will continue to be processed as above including recording on Clear Care and reporting to the necessary services.
- 18.6 Safeguarding Training, including the requirements for the DSL, will be done online where possible or face to face if practicable. All new staff will complete Safeguarding Children and adults online until it is possible to do face to face.
- 18.7 It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, Fair Ways will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of KCSIE. In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact – see <https://www.gov.uk/government/news/covid-19-changes-to-dbs-id-checking-guidelines>. Fair Ways will continue to comply with the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE. Fair Ways will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct: advice for making a referral'. During the COVID-19 period all referrals should be made by emailing Misconduct.Teacher@education.gov.uk. Whilst acknowledging the challenge of the current environment, it is essential from a safeguarding perspective that any school or college is aware, on any given day, which staff/volunteers will be in the school or college and that appropriate checks have been carried out, especially for anyone



engaging in regulated activity. As such, Fair Ways will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

- 18.8 Fair Ways Education will continue to provide a safe environment, including online. This includes the use of an online monitoring and filtering system. Where children are using computers in school, appropriate supervision will be in place. It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the child protection policy and where appropriate referrals should still be made to children's social care and as required the police.

Appendix A – Previous policy reviews

Document Ref:	Version No:	Summary of Changes:	Author	Release Date:	Approved By:
SC10	1	Launch	Gareth Webb	December 2015	QGSC
SC10	2	Safeguarding and Child Protection now split to 3 separate policies	Gareth Webb	October 2016	QGSC
SC10	3	Review 2016 / 2017	Gareth Webb	November 2016	QGSC
SC10	4	Amend DSL names	Gareth Webb	June 2017	QGSC
SC10	5	Review 2017 / 2018	Gareth Webb	November 2017	QGSC
SC10	6	Review 2018 / 2019	Gareth Webb	June 2018	QGSC
SC10	7	Review 2019 / 2020	Laura Willis	June 2019	QGSC
SC10	8	Updated legislation	Laura Willis	November 2019	QGSC