# Fair Ways Schools
# Safeguarding Policy

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## Fair Ways Vision, Mission and Values

**Our vision**
To build a community that changes lives, makes a difference to society and leaves a legacy greater than us and our contributions.

**Our mission**
To grow a compassionate, resilient, and trauma-informed community, that embraces learning, so that we improve the lives and outcomes of individuals.

**Our values**
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 Fair Ways to *play their part*:

| **P**ROFESSIONAL | **A**CCEPTING | **R**EFLECTIVE | **T**RANSPARENT |
|---|---|---|---|
| · We do what we say we will.<br>· We approach challenges with optimism and enthusiasm.<br>· We don't judge, we notice.<br>· We put the needs of the service before our own personal gains. | · We don't give up on people.<br>· We value all individuals and are willing to challenge them.<br>· We embrace each other's differences as much as our similarities.<br>· We accept responsibility for our actions. | · We give feedback, we invite feedback, we listen to feedback.<br>· We look inward before we look outward.<br>· We learn as much from our mistakes as from our successes.<br>· We listen to each other, learn from each other and grow together. | · We are always willing to explain why.<br>· We have the courage to be open and honest.<br>· We earn trust through our transparency.<br>· We live by our values even when no-one is watching. |

**Policy Statement**

Safeguarding determines the actions that we take to keep children and young people 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 students.

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

1.1 Within Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2023) and the latest Ofsted inspection guidance, 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 students as an individual (4); other safeguarding issues affecting students (5); and those related to the running of the school (6).*

1.2 Within this document:

'***Safeguarding'*** is defined in the Children Act 2004 as protecting children 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 18th birthday. On the whole, this will apply to students at 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, stepparents 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:

- Providing help and support to meet the needs of children as soon as problems emerge.
- 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 make a member of staff aware of concerns and/or situations which are giving them worries. The staff will pay attention to the young person, take their worries seriously and share the information with the designated safeguarding lead.

2.5 Staff should be alert to children and families who may benefit from early help or Family Help. Concerns should be shared with the DSL at the earliest opportunity so that needs can be assessed, support can be coordinated with parents and carers where appropriate, and referrals can be made to children's social care when statutory intervention may be required.

2.6 In addition we provide young people with information of who they can reach out 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 and whenever statutory guidance, Department for Education requirements, Ofsted expectations or local safeguarding partnership arrangements change.

## 3 The Role of school 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. Staff are responsible for ensuring that each young person is supported to recognise when something is wrong and to share concerns in a way that is accessible to them, including where they are not able to communicate verbally.

3.3 Fair Ways Education has a designated safeguarding lead, and each site has a minimum of three deputy designated safeguarding leads who support staff to carry out their safeguarding duties and liaise with relevant services. All DSLs and DDSL's are trained as DSL's. The school ensures that a trained DSL or deputy is available during school hours, including during off-site activities where reasonably practicable, and that staff know who to contact if the named DSL is unavailable.

3.4 The Designated Safeguarding Leads (and deputies) are:

**School DSL's**

- Victoria Adams Executive Head teacher education

**School Based DSL's**

- All SLT members at each site are trained as Designated Safeguarding Leads.

3.5 All staff receive robust and appropriate yearly safeguarding as well as any relevant updates through daily, weekly briefings. The monthly safeguarding calendar and regular Andrew Hall briefings.

## 4 Abuse, neglect and exploitation

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 or deputy.

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, neglect and exploitation :

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. Abuse includes harm that can include when children see, hear or experience domestic abuse and its effects.

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, intentionally isolating them from others, or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, including interactions that are beyond a child's developmental capability, overprotection, limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing, hearing or experiencing the ill-treatment of another, including the impact of domestic abuse. 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 may be involved in all types of maltreatment of a child, although it may also 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 penetration with an object ) 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## 5 Safeguarding Issues

5.1 All Fair Ways School staff are aware of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sharing of nude and semi-nude images put the school's 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.

5.2.2 Children who are being exploited may also be committing criminal acts, but they cannot give informed consent to engage in criminal or exploitative activity. Children who are exploited, abused or trafficked must be treated as victims. This applies to

older children too, where there is a particular risk that vulnerability may be overlooked. Staff should be aware that victims are not always recognised as such and may be criminalised for actions taken under coercion or exploitation. Victims may also not know or understand that they are being exploited. Staff must remain professionally curious, consider the wider context of the child's circumstances, and share concerns with the DSL without delay.

5.2.3 Pregnancy in a child should be recognised as a potential safeguarding risk factor and must be considered alongside the child's age, circumstances, relationships, consent, capacity, possible coercion, exploitation, abuse, neglect, domestic abuse, trafficking or harmful sexual behaviour. Staff must share any known or suspected pregnancy in a child with the DSL without delay so that appropriate safeguarding action, health support, parental involvement where appropriate, and referral to children's social care can be considered.

5.3 Child on Child Sexual Violence and Sexual Harassment

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

5.3.2 The school adopts a zero-tolerance, victim-centred approach to child-on-child abuse, sexual violence and sexual harassment. Incidents will never be dismissed as banter, part of growing up or normal behaviour. The DSL will consider the immediate safety of the child, record the concern, assess risk, consider whether police or children's social care involvement is required, and ensure appropriate support is provided for the victim, alleged perpetrator and any other children affected.

5.3.3 Harmful sexual behaviour includes developmentally inappropriate sexual behaviour, sexually abusive behaviour, coercion, harassment, image-based abuse and behaviour involving a power imbalance. Staff must report concerns to the DSL without delay and must not investigate concerns themselves.

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 Staff should also be alert to children who may benefit from early help or Family Help, including children with special educational needs or disabilities, young carers, children affected by parental mental ill health, substance misuse or domestic abuse, children

experiencing homelessness, children who have a family member in prison, children at risk of exploitation or serious violence, children frequently absent from education, and children whose behaviour, mental health or presentation changes significantly.

5.4.3 Professionals should be alert to the need for early help for a child who:

- Is frequently missing/goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from school, college or alternative provision.
- Has a parent or carer in custody or is affected by parental offending

5.4.4 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 students 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 student's peers making comments or suggestions as to where the student 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?

5.4.5 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 Extra Familial Harm

5.5.1 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 home. 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.

## 5.6 County Lines

5.6.1 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.

5.6.2 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.

## 5.7 Domestic Abuse

5.7.1 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, psychological, physical, sexual, financial and emotional abuse. Children who see, hear or experience the effects of domestic abuse are recognised as victims in their own right and this must be treated as a safeguarding concern.

- psychological
- physical
- sexual
- financial
- emotional
- Please note children witnessing domestic abuse is now classed under abuse.

5.7.2 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.

5.7.3 Child-to-parent or caregiver abuse can include physical, emotional, psychological, financial or coercive behaviour by a child towards a parent, carer or other family member. Staff should recognise that this may indicate unmet need, trauma, exploitation, domestic abuse, mental health concerns or wider safeguarding risks, and should share concerns with the DSL so that appropriate support and referrals can be considered.

5.7.4 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.

5.7.5 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. Abuse includes harm that can include when children see, hear or experience domestic abuse and its effects.

5.7.6 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.

5.7.7 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

5.7.8 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.

5.7.9 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.

## 5.8 Female Genital Mutilation ('Honour-based' abuse)

5.8.1 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.

## 5.9 Forced Marriage ('Honour-based' abuse)

5.9.1 A forced marriage is a marriage in which one or both people do not, or cannot, consent to the marriage and pressure, coercion or abuse is involved. It is a criminal offence to force someone to marry, and this includes arranging for a child under the age of 18 to marry, whether or not force or coercion is used. Staff must treat any concern that a child may be at risk of forced marriage as a safeguarding concern and report it to the DSL immediately.

5.9.2 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.

5.9.3 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.

5.9.4 Policies and practices in this school reflect the fact that while all members of staff, including teachers, have important responsibilities with regard to students 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.

5.9.5 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.

5.9.6 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 student'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.

## 5.10 Honour Based Violence ('Honour Based' abuse)

5.10.1 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.

5.10.2 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.

5.10.3 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.

5.10.4 If staff believe that a student 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 student 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.

## 5.11 Mental Health

5.11.1 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.

5.11.2 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.

5.11.3 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.

5.12 Missing, Exploited and Trafficked Children (MET)

5.12.1 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.

5.13 Parental mental health

5.13.1 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.

5.13.2 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.

5.13.3 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.

## 5.14 Children with SEND, disabilities and additional vulnerabilities

5.14.1 Children with SEND or disabilities can face additional safeguarding barriers. Staff should be alert to assumptions that behaviour, communication or presentation is linked only to a child's needs or diagnosis; increased risk of isolation, bullying, prejudice or exploitation; communication barriers; difficulty recognising or disclosing abuse; and concerns being missed because adults do not seek the child's voice. Staff must consider safeguarding whenever there is a change in behaviour, attendance, wellbeing or presentation and must share concerns with the DSL.

## 5.15 Children looked after, previously looked after and kinship care

5.15.1 The school recognises the additional vulnerabilities that may affect children looked after, previously looked after and children in kinship care. Staff will work with the designated teacher, carers, parents where appropriate, social workers and the Virtual School Head where relevant to ensure safeguarding information, education plans, risk assessments and support arrangements are coordinated and reviewed.

## 5.16 Parental Substance misuse

5.16.1 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.

5.16.2 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.

5.16.3 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.

5.16.4 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.

5.16.5 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.

## 5.17 Child on Child Abuse

5.17.1 All staff should be aware that children can abuse other children. Child-on-child abuse will never be treated as "banter", "part of growing up" or behaviour that children should tolerate. Staff will challenge and report behaviours that may indicate harmful sexual behaviour, sexual harassment, sexual violence, misogyny, prejudice, bullying, intimidation or a culture that normalises 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.
- Sharing of nude and semi-nude images
- Initiation/hazing type violence and rituals.

## 5.18 Preventing Radicalisation and Extremism

5.18.1 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.

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

5.18.3 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.

## 5.19 Serious Violence and Criminal Exploitation

5.19.1 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).

5.19.2 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).

## 5.20 Trafficked Children and Modern Slavery

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 children's needs

## 6.1 Gender Questioning Children – Safeguarding and Staff Responsibilities

6.1.1 The school recognises that some children may question their gender or express uncertainty about their gender identity. In accordance with *Keeping Children Safe in Education 2026* (KCSIE), the school's primary responsibility is to safeguard and promote the welfare of every child and to consider the individual circumstances and best interests of the child.

6.1.2 Gender questioning, in itself, should not be treated as evidence that a child is at risk of harm. However, staff must remain alert to any safeguarding concerns that may arise in relation to an individual child and must follow the school's safeguarding procedures where such concerns are identified.

6.2 Staff response

6.2.1 Where a child raises questions about their gender or approaches a member of staff about their gender, staff should:

- respond calmly, sensitively and professionally;
- listen to the child and take what they say seriously;
- avoid making assumptions about the child's circumstances, family, wellbeing or reasons for questioning their gender;
- avoid attempting to diagnose, label or direct the child towards a particular gender identity or outcome;
- avoid unnecessary or intrusive questioning;
- maintain appropriate professional boundaries;
- explain that information cannot necessarily be kept confidential where a safeguarding concern arises;
- record any relevant disclosure or concern accurately, objectively and contemporaneously, using the child's own words where appropriate;
- inform the Designated Safeguarding Lead (DSL) where the information gives rise to a safeguarding concern or where the member of staff is uncertain about the appropriate course of action.

6.2.2 Staff should not treat a child's gender questioning as, in itself, evidence of abuse, neglect or poor parenting. Equally, staff must not disregard other indicators of vulnerability or risk merely because they arise in the context of gender questioning.

**6.3 Safeguarding concerns**

6.3.1 Where a child discloses, or a member of staff identifies, a concern relating to abuse, neglect, exploitation, coercion, violence, bullying, harassment, self-harm, suicidal ideation, sexual abuse, online harm or any other risk to the child's welfare, the school's normal safeguarding procedures must be followed.

6.3.2 The concern must be referred promptly to the DSL in accordance with the school's safeguarding policy. Staff should not investigate the matter themselves or seek to establish whether an allegation is substantiated.

6.3.3 The DSL will consider the information in accordance with KCSIE 2026 and the school's safeguarding procedures and will determine whether further action, including referral to children's social care or another relevant agency, is required.

## 6.4 Requests concerning social transition

6.41 Where a child asks the school to support any aspect of social transition, including a request concerning a name, pronouns, uniform or other aspects of presentation, staff must not make an informal or individual decision outside the school's agreed procedures.

6.4.2 The school will consider such requests carefully, having regard to:

- the child's best interests and welfare;
- the school's safeguarding duties;
- the individual circumstances of the child;
- the views of the child's parents or carers, unless there is a genuine safeguarding reason why this would not be appropriate;
- any relevant clinical advice or information available to the family;
- the impact of any proposed arrangements on the child and on other students; and
- the school's duties under relevant legislation, including the Equality Act 2010 and Human Rights Act 1998.

6.4.3 KCSIE 2026 requires schools to consider policies concerning social transition, in light of, their safeguarding duties and other legal obligations. Decisions should therefore be made on an individual, case-by-case basis and should not be based on a blanket assumption that a particular course of action is appropriate for every child.

6.4.4 Staff must refer requests for social transition to the appropriate senior leader/DSL in accordance with the school's procedures rather than making commitments to a child or family independently.

## 6.5 Parents and carers

6.5.1 The school will normally seek the views and involvement of parents or carers when considering matters concerning a child who is questioning their gender, recognising the important role of parents and carers in safeguarding and promoting children's welfare.

6.5.2 However, information must not be shared automatically where doing so could place the child at risk of harm. Where a member of staff is concerned that involving a parent or carer may create or increase a safeguarding risk, the matter must be referred to the DSL before information is shared.

6.5.3 The DSL will consider the circumstances and, where necessary, seek appropriate professional advice.

6.6 Confidentiality and information sharing

6.6.1 Staff must not promise a child absolute confidentiality. Where information indicates that a child may be at risk of harm, information must be shared in accordance with the school's safeguarding procedures and the information-sharing requirements set out in KCSIE.

6.6.2 Only information that is relevant, necessary and proportionate should be shared, and staff should record the reasons for decisions concerning information sharing.

6.7 Equality, dignity and protection from harm

6.7.1 All students are entitled to be treated with dignity and respect and to be protected from abuse, bullying, harassment and discrimination. The school will not tolerate bullying or harassment relating to gender questioning or gender expression.

6.7.2 At the same time, the school's safeguarding and other legal duties apply to all students. Staff must therefore balance the individual child's welfare with the school's responsibility to safeguard and promote the welfare of all students.

6.7.3 Any concerns about bullying, harassment, abuse or other harmful behaviour must be dealt with under the school's safeguarding, behaviour and anti-bullying procedures as appropriate.

6.8 Staff who are unsure

6.8.1 Where staff are unsure how to respond to a child who is questioning their gender, they should **not make an informal commitment or decision on behalf of the school**. They should seek advice from the DSL or the appropriate senior leader and follow the school's agreed policy and procedures.

6.9 Students with medical conditions (in school)

(There is a separate policy outlining the school's position on this – Medication, First Aid and Intimate care policy.)

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

6.9.2 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.

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

### 6.10 Students with medical conditions (out of school)

6.10.1 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.)

6.10.2 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 student's education.

### 6.11 Fabricated or induced illness

6.11.1 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.

6.11.2 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 students.

7.1 **Bullying**: the school adheres to a separate bullying policy (Refer Anti-Bullying Policy [DOC REF SC05]

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 adheres to a separate drug management policy. (Refer Drug Incident Management Policy [DOC REF SC12]

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 The school will manage the safeguarding risks associated with mobile phones and connected devices through its behaviour, online safety and acceptable use arrangements. Students will be expected to follow the school's rules on mobile phones during the school day, and staff will respond promptly where devices are used to bully, exploit, harass, share harmful content or create safeguarding concerns.

8.3 **Online Safety**

8.3.1 With the current speed of online change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often children come across harmful or inappropriate material online and may be unsure how to respond. Risks may include unwanted contact, grooming, online bullying, harmful content, digital footprint, disinformation, misinformation, conspiracy theories, artificial intelligence tools, deepfakes, impersonation, digitally manipulated images, nudification apps and AI-generated nude or semi-nude images.

- Unwanted contact.
- Grooming.
- Online bullying including sharing of inappropriate images.
- Digital footprint.

8.3.2 The school will therefore seek to provide information and awareness to both students and their parents through:

8.3.3 The school will maintain appropriate filtering and monitoring systems to reduce the risk of children accessing harmful online content while using school technology. These arrangements will be reviewed at least annually, and sooner where risks, technology, incidents or statutory guidance indicate that a review is required. Leaders, governors and relevant staff will understand their roles in overseeing and responding to filtering and monitoring concerns.

8.3.4 Online safety will be considered across the four areas of risk: content, contact, conduct and commerce. This includes harmful or inappropriate online material, contact from adults or peers who may pose a risk, online behaviour that may cause harm, and risks such as scams, gambling, extortion or commercial exploitation.

8.3.5 The DSL, senior leaders, governors and IT/provider staff will maintain oversight of filtering and monitoring. The school will identify who is responsible for day-to-day management, how concerns are reported, how effectiveness is checked, how incidents are escalated, and how staff are trained to understand their role in keeping children safe online as follows:

- 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.

8.4 **Social media:**

8.4.1 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 sharing of nude and semi-nude images.
- Digital footprint.

8.4.2 The school will therefore seek to provide information and awareness to both students 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.

8.5 **Cyberbullying**:

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

8.5.2 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 students when they are away from the site.

8.5.3 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."

8.5.4 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.

8.5.6 Cyber-bullying may be at a level where it is criminal in character.

8.5.7 It is unlawful to disseminate defamatory information in any media including internet sites.

8.5.8 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.

8.5.9 The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

8.5.10 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.

8.6 **Sharing of nude and semi-nude images**

8.6.1 Previously known as 'sexting', this refers to the sharing or creation of naked, nude or semi-nude images or videos through phones, devices, apps or the internet. It also includes underwear images, sexual poses, explicit messages, digitally manipulated images, deepfakes and AI-generated or AI-altered intimate images.

8.6.2 While the sharing of nude and semi-nude images often takes place in a consensual relationship between two young people, the use of such images in revenge following a relationship breakdown is becoming more commonplace. The sharing of images can also be used as a form of sexual exploitation and takes place between strangers.

8.6.3 As the average age of first smartphone or camera enabled tablet is 6 years old, sharing of images is an issue that requires awareness raising across all ages.

8.6.4 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.

8.7 **Gaming**

8.7.1 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.

8.8 **Online Reputation**

8.8.1 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.

8.9 **Online Grooming**

8.9.1 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.

8.9.2 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.

8.9.3 That parents should: recognise the signs of grooming, have regular conversations with their children about online activity and how to stay safe online.

8.9.4 The school will raise awareness by: running sessions for parents, including 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 must record the concern on the school's safeguarding recording system and report it to the DSL or deputy without delay. If there is an immediate or imminent risk of harm, staff must report this to a member of SLT immediately and ensure urgent safeguarding action is taken.

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 Teacher immediately. If there is cause to make a notification to the Head Teacher whilst away from school, this should be done by telephone. Staff must not just leave an answerphone message. If the Headteacher is not contactable, the member of staff should contact either the Executive head or Deputy Head.

9.4 Concerns about the Head Teacher should be directed to Vic Adams Executive head teacher.

9.5 Allegations or concerns about adults working with children must be reported in line with the school's managing allegations procedures and referred to the Local Authority Designated Officer (LADO) where the threshold is met. Staff must seek advice from the Head Teacher, Executive Headteacher, DSL or HR before taking action, unless there is an immediate risk of harm, in which case emergency services or children's social care should be contacted without delay.

**9.6 Low-level concerns, staff conduct and whistleblowing**

9.6.1 Any concern about an adult working with children, including supply staff, contractors, volunteers and visitors, must be shared using the school's safeguarding and staff conduct procedures. This includes concerns that do not meet the allegations threshold. Low-level concerns may include conduct that is inconsistent with the staff code of conduct, causes a sense of unease, or may indicate a pattern of behaviour. Staff are expected to self-report where they believe they may have acted in a way that could be misinterpreted.

9.6.2 Low-level concerns will be recorded, reviewed and managed by the Head Teacher, Executive Headteacher or another appropriate senior leader. Records will be kept confidentially and reviewed to identify patterns, training needs or wider safeguarding risks. Where the threshold for allegation management is met, advice will be sought from the LADO without delay.

9.6.3 Staff must raise concerns about safeguarding practice internally with the DSL, Head Teacher or Executive Headteacher. If staff feel unable to raise a concern internally, or feel that their concern has not been addressed, they may use the school's whistleblowing procedure or contact the NSPCC Whistleblowing Advice Line.

**9.7 Information Sharing and Safeguarding Records**

9.7.1 Safeguarding information will be shared in a timely, necessary and proportionate way to protect children and promote their welfare. The DSL is responsible for ensuring that child protection and safeguarding records are accurate, securely stored, and transferred promptly when a student moves to another school or setting, with relevant safeguarding and risk information shared so that support and protective action can continue without delay.

9.7.2 Data protection law does not prevent, or limit, the sharing of information for the purpose of keeping children safe. Staff must share information when it is necessary, proportionate and lawful to protect a child, and should record the information shared, who it was shared with, the reason for sharing, decisions made, actions taken and outcomes.

9.7.3 Safeguarding records should be factual, accurate, timely, signed or attributable to the person making the record, and dated. Records should include the child's voice where appropriate, the rationale for decisions, actions taken, advice sought and outcomes. Concerns that do not result in referral must still be recorded and monitored.

## 10 The use of 'reasonable force' in school (RiiSE)

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 School operates a separate policy (RiiSE) 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 & Selection Policy [DOC REF OR32]. On all recruitment panels there is at least one member who has undertaken safer recruitment training.

11.2 The process checks identity, right to work in the UK, qualifications, employment history, references, suitability to work with children, and criminal record information,

including enhanced DBS checks and barred list checks where required. Online searches are completed for shortlisted candidates in line with safer recruitment expectations.

11.3 Volunteers will be risk assessed before they work with children. The school will determine whether the role is regulated activity and will complete the required safer recruitment checks, including enhanced DBS and barred list checks where applicable. Volunteers will receive appropriate safeguarding induction, supervision and clear expectations about conduct, reporting concerns and working safely with children.

11.4 The DSL or their deputy will provide all new staff with safeguarding induction so they understand the child protection policy, this safeguarding policy, the staff behaviour policy/code of conduct, the role of the DSL and deputies, the school's safeguarding response procedures, and Part One of Keeping Children Safe in Education in full. The school will check that staff have read and understood the guidance and know how to act if they have a concern about a child.

11.5 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.

11.6 The school will maintain a single central record of recruitment and vetting checks in line with statutory requirements. The record will include relevant identity, barred list, enhanced DBS, prohibition, section 128 where applicable, right to work, qualification and overseas checks, together with dates and evidence of completion where required.

11.7 For alternative provision or off-site education commissioned by the school, Fair Ways School remains responsible for the safeguarding of students it places. The school will obtain written confirmation that safeguarding checks and procedures are in place, share relevant safeguarding information, agree attendance and communication arrangements, monitor the suitability of the placement, and review concerns promptly with the provider and relevant agencies.

11.8 Where school premises are used by external organisations, the school will seek assurance that appropriate safeguarding and child protection arrangements are in place. This includes checking that organisations have suitable policies, safer recruitment arrangements and procedures for managing allegations or concerns. Where concerns arise about an organisation using school premises, the school will follow safeguarding procedures and refer to the LADO or relevant agencies where required.

## 12 Governance, training and safeguarding oversight

12.1 The governing body, proprietor or management committee is responsible for ensuring that the school has effective safeguarding policies, procedures and culture. This includes oversight of safer recruitment, the single central record, safeguarding training, child protection procedures, online safety, filtering and monitoring, allegations management, low-level concerns, information sharing and the impact of safeguarding practice.

12.2 All staff will receive safeguarding and child protection training at induction and regular updates thereafter. Training will include Part One of Keeping Children Safe in Education, the role of the DSL, early help and statutory referral routes, child-on-child abuse, online safety, filtering and monitoring, information sharing, low-level concerns, whistleblowing and local safeguarding arrangements. DSLs and deputies will receive training at least every two years and regular updates to maintain knowledge and skills.

## 13 Disqualification under the Childcare Act

13.1 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.

13.2 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 1st 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.

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

13.4 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.

13.5 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.

## 14 Health and Safety

14.1 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.

14.2 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.

## 15 Site Security

15.1 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 red visitor lanyards.
- 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.

## 16 Off site visits

16.1 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.

16.2 The school uses a risk assessment programme called EVOLVE where all hazardous off site activities are checked and authorised by the local authority before being signed off. 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 and uploaded to the EVOLVE system for Local authority sign off.

16.3 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.

## 17 First Aid

17.1 There is a separate Health and Medication Policy [DOC REF SC20]

## 18 Taking and the use and storage of images

18.1 As a school we will seek consent from the parent of a student 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.

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

18.3 We will seek consent for the period the student 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.

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

## 19 Police and Criminal Evidence Act (1984) – Code C

19.1 The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

19.2 PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

19.3 PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

19.4 The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a young person about an offence they may suspect. This communication will be recorded on Clearcare.

19.5 If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

19.6 A person whom there are grounds to suspect of an offence must be cautioned before questioned about an offence or asked further questions if the answers they provide the grounds for suspicion, or when the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

19.7 A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

19.8 The appropriate adult' means, in the case of a child:

- the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
- a social worker of a local authority
- failing these, some other responsible adult aged 18 or over who is not:
    - a police officer;
    - employed by the police;
    - under the direction or control of the chief officer of a police force; or
    - a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions

## 20 Associated Documentation & Legislation

- Keeping Children Safe in Education (2026)
- Working together to safeguard children (DfE 2023a)
- Children Act 2004
- Anti-Bullying Policy [DOC REF SC05]
- Drug Incident management Policy [DOC REF SC12]
- Communications Act 2003
- Harassment Act 1997
- Childcare Act of 2006
- Health and Safety at Work act 1974
- Police and Criminal Evidence Act (1984)
- Equality Act 2010
- Human Rights Act 1998
- Recruitment & Selection Policy [DOC REF OR32].
- Health and Medication Policy [DOC REF SC20]

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|---|---|---|---|---|---|
| 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 | QSGC |
| SC10 | 8 | Updated legislation | Laura Willis | November 2019 | QSGC |
| 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 |