



New Barn School

SAFEGUARDING POLICY

LEAD DSL: Lucinda Stonell

SAFEGUARDING GOVERNOR: Alice Anstee

1.0 Policy statement

Outcomes First Group is committed to ensuring that all of the people we support are effectively safeguarded in all services including fostering, schools and residential homes at all times. This policy applies to all children and young adults receiving education in our settings. It applies when working online and offline, in settings and in all virtual communications.

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

It is essential that everybody working within the Outcomes First Group understands their safeguarding responsibilities. Governing bodies and proprietors must ensure that staff who work directly with children read and understand Part 1 of [KCSIE 2021](#). Staff who do not work directly with children can read and understand either Part one or Annex A if it is more effective to enable them to safeguard and promote the welfare of children.

All Outcomes First Group employees working directly or indirectly with children **must** ensure that:

- children and young people feel safe and that they are listened to;
- they create an environment and culture in which children and young people feel valued;
- the best interests of the child are always considered and acted upon;
- safer recruitment procedures are rigorously followed (please refer to the Outcomes First Group Safer Recruitment Policy for further details);
- they understand their roles and responsibilities in keeping children and young people safe through ongoing learning, development and supervision;
- they are vigilant in monitoring possible signs of abuse including for those children and young people who have complex learning difficulties or specific communication needs, who may be particularly vulnerable;
- they maintain an attitude of **'it could happen here'**;
- they follow the appropriate procedures in place for sharing safeguarding concerns and that these are shared with relevant professionals in a timely manner;
- they understand and implement local safeguarding procedures as set out in local authority arrangements;
- children and young people have opportunity to learn about appropriate relationships with adults and recognise unacceptable behaviour by adults.
- they are aware that children can abuse other children (i.e. peer-on-peer abuse).
- there is a zero-tolerance approach to harassment, violence, abuse, inappropriate behaviour and bullying of any kind are not acceptable and will not be tolerated.

2.0 What is safeguarding and child protection?

2.1 Safeguarding

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

2.2 Safeguarding is defined in Working Together to Safeguard Children (DfE, Sept 2018, updated Dec 2020) as:

- Protecting children from maltreatment;
- Preventing impairment of children's health and development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

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

2.4 Child Protection

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

2.5 Safeguarding is everyone's responsibility

While local authorities and placing authorities have statutory responsibilities regarding safeguarding, Outcomes First Group believes that safeguarding is everyone's responsibility. The Group expects that staff keep the child or young person at the centre of all that they do and that any actions taken are in the best interests of the child. We also expect that children and young people are listened to and their voices are always heard. This is without exception and regardless of whether the child or young person is being cared for in a residential setting, foster home or being educated within school or remotely.

2.6 Defining Significant Harm/Child Abuse

'Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including: sexual, physical and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should put the needs of children first when determining what action to take' (Working Together to Safeguard Children July 2018, updated Dec 2020)

2.7 The Children Act 1989 introduced the concept of 'Significant Harm' as the threshold that justifies compulsory intervention in family life in the best interests of children. Under Section 47 of the Act, local authorities have a duty to make enquiries to decide whether

they should take action to safeguard or promote the welfare of a child who is suffering or is likely to suffer Significant Harm.

2.8 Under s31(9) of the Children Act 1989 as amended by the Adoption and Children Act 2002:

'harm' means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another;

'health' means physical or mental health; and

'ill-treatment' includes Sexual Abuse and forms of ill-treatment which are not physical.

Abuse or neglect is not always easy to identify; staff are more than likely to have some information but not the whole picture.

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

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

2.10 It is also important to be aware that:

- technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.
- that children can abuse other children (often referred to as peer-on-peer abuse). And that it can happen both inside and outside of school or college and online.

2.11 All staff must be aware of the signs and indicators of child abuse.

3.0 Local Arrangements for the school

3.1 All staff must be aware of the local arrangements for safeguarding relevant to the school in which they work;

3.2 The local arrangements for New Barn school are as follows:

3.3 New Barn School's safeguarding arrangements are in line with local safeguarding partnership arrangements. The West Berkshire safeguarding partnership consists of the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police force in the local authority area).

3.4 The Local Authority Designated Officer is Fiona Goussard.

3.5 All safeguarding referrals must be reported to the local authority 01635 503090 or child@westberks.gov.uk. Referrals for children and young people under 18 will be dealt with under the Children's safeguarding arrangements, whereas those 18 and above will be dealt with under the Adult Safeguarding Arrangements.

- 3.6** The local authority safeguarding referral procedure is that the referral will be evaluated on the same day that it was received. An outcome decision will be made by a qualified social worker alongside their Team Manager within 24 hours about the type of response that is required. The practitioner should inform, in writing, all the relevant agencies and the child, if appropriate, and family of their decisions. If the referrer disagrees with the decisions made by Children's Social Care about the outcome of the referral, they may consider making a complaint under the local Complaint procedure or raise the matter under the local Professional Disagreement / Escalation Protocol
- 3.7** For all referrals regarding radicalisation – contact the Contact Advice Assessment Service on 01635 503190 or Thames Valley police Prevent officers – preventreferrals@thamesvalley.pnn.police.uk. If a child is in immediate danger call the police.
- 3.8** For all referrals regarding contact the Contact Advice Assessment Service 01635 503190 or child@westberks.gov.uk
- 3.9** The local authority procedure for an early help referral is delivered in partnership with Contact, Advice and Assessment Service (CAAS) and the Targeted Intervention Service (TIS) and includes input from various agencies including voluntary sector partners. Alongside the CAAS/TIS Early Response Hub West Berkshire will also utilise an adapted Multi-Agency Safeguarding Hub (MASH) model, employing multi-agency meetings in the form of group supervision to enhance our safeguarding capability at an earlier stage. Contact 01635 503190 or child@westberks.gov.uk.
- 3.10** The Chair of Governors for New Barn School is Max Turner.
- 3.11** The Outcomes First Group Head of Safeguarding can be contacted at: anne-marie.delaney@ofgl.co.uk
- 4.0 The role of Senior Managers and Governor**
- 4.1** Governors must have oversight of safeguarding policies and procedures and ensure that they are being effectively implemented within the school and that training is effective. In line with KCSIE (2021), which states that; '*Governing bodies and proprietors should have a senior board level (or equivalent) lead to take **leadership** responsibility for their schools or college's safeguarding arrangements*'. The named Governor for the school is Alice Anstee.
- 4.2** Like teaching staff and volunteers, senior managers and Governors must be safely recruited and have all relevant checks on file. Please see the Group's Safer Recruitment Policy for further information.
- 4.3** It is the Governors' responsibility to ensure that there is a named Designated Safeguarding Lead (DSL) and that the school contributes to multi-agency working in line with Working Together to Safeguard Children (2018, updated Dec 2020).
- 4.4** Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. This has to be balanced with their duty to protect the victim and other children.

4.5 Where the School premises are used for non-school/college activities and the services or activities are provided under the direct supervision or management of the school staff, the schools arrangements for child protection and safeguarding apply. Where service or activities are provided by another body, the School must seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and ensure they will liaise with the school on these matters as appropriate.

5.0 Designated Safeguarding Lead (DSL)

5.1 *'Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role-holder's job description.'* (KCSIE 2021)

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

5.3 The Head Teacher must ensure that job descriptions for DSL and Deputy DSLs are kept on personnel files and clearly state their responsibilities.

5.4 The DSL (or deputy) must always be available during school hours for staff to discuss any concerns.

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

- provide support to staff regarding safeguarding concerns;
- lead on advising staff of any action to be taken due to a safeguarding concern;
- ensure that children and young people are immediately safeguarded from harm and abuse;
- ensure that there is appropriate cover during their absence, and that staff know who to approach if the DSL is unavailable;
- liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries;
- adopt a child-focused and holistic approach ensuring the child's wishes and feelings are taken into account when determining what action to take
- refer allegations to the Local Authority Designated Officer or equivalent;
- refer safeguarding concerns to placing and host local authorities;
- refer suspected cases of radicalisation to Channel;
- refer suspected case of Female Genital Mutilation to the police;
- refer suspected cases of Child Sexual Exploitation and trafficking to the police;
- refer cases to the Disclosure and Barring Service after staff have been dismissed or there is suspected harm having been caused to children and young people;
- liaise with Outcomes First Group Quality Assurance Team and HR Team if any allegations or suspected harm having been caused to a child by an employee, supply staff or volunteer for Outcomes First group;
- ensure that the school complies with the work of the local safeguarding partnership.

- Ensure that all staff receive regular update training in relation to safeguarding;
- provide safeguarding updates to senior managers and school governors;
- ensure that there is effective monitoring and oversight of all safeguarding concerns;
- promoting the educational achievements of Looked After Children in line with the Children and Social Work Act 2017.

5.6 It is important that all staff understand the role of the DSL on their appointment within the school and as part of their induction. The DSL is responsible for ensuring that all staff understand their roles and responsibilities regarding safeguarding children and that a child focused approach is taken. The DSL will assess safeguarding concerns within the context of young people's environments. This is known as contextual safeguarding.

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

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

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

5.9 When young people move schools or move into further or higher education, the DSL is responsible for ensuring that the necessary information is shared with the new school or college. It is the DSL's responsibility to ensure that a pupil's child protection file is transferred to the new school or college as quickly as possible and as securely as possible. Confirmation of receipt must be obtained. **Files must be transferred securely.** Schools must inform their Local Authority of all deletions from their admission register when a child is taken off roll.

5.10 Consideration must be given to sharing information verbally with the new school or college prior to the child or young person leaving. The DSL must ensure that confidentiality of any third parties is not breached and that they comply with GDPR. Records must contain factual information and must not be speculative. These documents must be kept confidential with the exception of sharing them with relevant professionals as part of safeguarding and protecting the child or young person. Records must be updated, and any actions must be followed up and completed. It is the responsibility of the DSL to ensure that a safe and satisfactory outcome has been reached and that all actions have been completed.

6.0 Safeguarding Training and Updates for all staff

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

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

6.2 This policy **must** be read in conjunction with Keeping Children Safe in Education (2021). **All staff are expected to follow this policy and statutory guidance including KCSIE 2021.**

6.3 All staff must read the following documents:

- Part 1 (or Annex A where appropriate) of [KCSIE 2021](#)
- The school's Restrictive Physical Intervention Policy
- The school's Anti-bullying policy
- Outcomes First Group's Peer-on-peer abuse policy
- Outcomes First Group's Exploitation policy
- Outcomes First Group's Protecting Children from Radicalisation policy
- Outcomes First Group's Harmful Sexual Behaviours policy
- Outcomes First Group's Safer Recruitment policy
- Outcomes First Group's Data Protection policy
- Outcomes First Group's Web Filtering policy
- Outcomes First Group's Staying Safe Online
- The school's Whistle blowing and complaints policy
- The school's staff behaviour policy (Code of Conduct)
- The school's description and guidance of the role of the DSL
- The school's description and guidance of the role of the Deputy DSL
- [DfE guidance on sexual violence and harassment between children in schools and colleges](#)
- [DfE guidance on Children Missing in Education](#)
- [DfE guidance on Promoting the Education of Looked After Children](#)
- [DfE guidance on Teaching Online Safety in Schools](#)
- [DFE Guidance on Sharing nudes and semi-nudes advice for education settings working with children and young people](#)
- [DFE Guidance on Searching, Screening and Confiscation](#)

6.4 Safeguarding updates must be regularly provided to staff, either through face-to-face training, meetings or through regular written updates.

- Face to face safeguarding training must be provided (and recorded) to **all staff at least annually.**
- **DSL** must refresh their advanced training **at least every two years.**

6.5 All members of school leadership teams, including the Head Teacher and DSL should also be familiar with **Working Together to Safeguard Children 2018** (updated Dec 2020).

7.0 Roles and Responsibilities of Staff

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

7.2 During staff induction, staff will receive safeguarding training, including online safety. Staff must be familiar and understand the role of the DSL, the local safeguarding partnership and the individual systems relating to safeguarding within the school. Staff must also know, understand and implement the school's behaviour management policy, the child protection policy, the school's code of conduct, the safeguarding response to children who go missing from education and Keeping Children Safe in Education 2021, Part 1.

7.3 Staff are responsible for:

- compliance with Outcomes First Group policies, statutory guidance and legislation including Keeping Children Safe in Education (2021) and Working Together to Safeguard Children 2018 (Updated Dec 2020);
- understanding the role of the DSL;
- helping to develop and deliver a curriculum which helps children and young people to understand about abuse, appropriate and safe relationships with adults and peers, and keeping safe both online and offline;
- helping to provide an environment where children and young people feel safe and valued;
- attending training and meetings;
- ensuring that they fully understand how to report concerns and if not, asking for further training and support;
- understand the safeguarding response to children who go missing from education;
- listening to children and young people;
- supporting children and young people if they disclose safeguarding information;
- ensuring that they are alert to signs of abuse by peers or adults;
- ensuring that they are aware of indicators or possible signs of neglect;
- ensuring that they closely monitor any possible signs of abuse or harm for those children who are unable to communicate verbally or who have complex health and care needs;
- keeping sensitive information confidential and sharing it only with those professionals for whom it is relevant;
- helping to identify those children or young people who may benefit from Early Help;
- helping to implement Child Protection Plans.

7.4 Staff are in a close position to children and young people within schools as they know the children and young people. They have regular contact with them and so are in the best position to know if a child or young person is behaving in a way which could possibly indicate that they are being hurt or harmed. Any concerns, whether these are nagging doubts, worries, concerns or based on information told to them, must be reported immediately to the DSL both verbally and in writing. **It is the staff member's responsibility to ensure that this information is acted upon. They have a duty to follow up with the DSL to ensure that action has been taken.**

8.0 Safer Recruitment

8.1 The Outcomes First Group Safer Recruitment Policy sets the processes which must be followed for the recruitment of staff and volunteers.

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

9.0 Early Help

9.1 *'A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989' (KCSIE 2021)*

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

9.3 Staff must be aware and alert to the possibility of Early Help being needed for those children and young people who have particular vulnerabilities, such as those who:

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

9.4 Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools provide as much information as

possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm

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

10.0 Reporting concerns

10.1 What to do if a child or young person discloses

Systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

If a child or young person discloses information to a member of staff, they must ensure that they:

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

- 10.2** Staff must be alert to not just potential familial abuse and allegations, but also to children and young people making allegations against staff, volunteers or peers. In these situations the Group's Managing Allegation Procedures must be followed. (See Section 24 for further details)

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

- 10.4** Staff must prioritise the child or young person's immediate safety. They must remain professional and adhere to all safeguarding and confidentiality procedures. After sharing the information with the DSL or deputy, they must not share it with anyone else.
- 10.5** On receipt of the information, the DSL must consider all information and then, in cases of serious concern, report this within **one working day** to the host authority, placing authority, Regional Director for Education and care and where relevant, the Local Authority Designated Officer.
- 11.0 Managing Referrals to DBS and professional bodies**
- 11.1** This may include referrals to Disclosure and Barring Service, Social Work England, or other professional bodies including the Care Council for Wales (CCW), and/or the Scottish Social Services Council (SSSC), Northern Ireland Social Care Council (NISCC) or Teacher Regulation Authority.
- 11.2** A Sub-Committee of the Outcomes First Group Safeguarding & Quality Committee takes an overview of all professional conduct issues to ensure the Group is compliant and consistent with all legal duties relating to referrals to professional bodies and the Disclosure and Barring Service.
- 11.3** Outcomes First Group managers must notify the Safeguarding Sub-Committee of all referrals and potential referrals to the Disclosure and Barring Service or any relevant professional body in the UK.
- 11.4** All professional conduct issues which may require a referral to a professional body, whether they relate to safeguarding children or not, must be referred to this sub-committee. For example, a teacher may be prohibited from teaching for a wide range of reasons which do not relate to the safety of children or young people.
- 11.5** The Safeguarding Sub-Committee will support the decision-making process to refer an employee to a professional body and/or DBS and make it clear who is responsible for the submission of any relevant documentation. This will normally be delegated to a senior manager within the division.
- 11.6** If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to the Disclosure and Barring Service or relevant government body in Scotland or Northern Ireland must be made. **It is an offence not to make a referral to the Disclosure and Barring Service in England and Wales.**
- 11.7** If a DBS referral is made, at the point of completion Outcomes First Group managers must notify the Group Head of Safeguarding and the Human Resources Operations Advisor of the referral and any other possible referrals to any relevant professional body in the United Kingdom, relating to the allegation made.
- 11.8** Where a teacher is dismissed or their services are no longer used because of serious misconduct or might have been dismissed or services ceased to be used had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

12.0 Partnership working and sharing information

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

12.2 General Data Protection Regulations

All schools must ensure that they comply with the Outcomes First Group's Data Protection policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to children and young people's personal information, as well as that of staff and parents/carers.

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

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

12.3 Schools must ensure that they inform pupils, parents and carers of how their personal information will be stored and used.

12.4 Schools must ensure that they hold emergency contact details of the parents/carers of pupils. This is to be done with the agreement of the parents/carers. In line with KCSIE (2021) schools must hold more than one set of contact details for each pupil, where reasonably possible.

12.5 Data breaches must be reported immediately to the Data Protection manager as set out in the Data Protection Policy.

13.0 Peer on Peer Abuse

13.1 It is essential that all staff understand that abuse is abuse and the importance of challenging inappropriate behaviours between peers. In addition to the information below, staff should familiarise themselves with the Outcomes First Group's **Peer-on- Peer abuse Policy**.

KCSIE (2021) states: **"Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it."**

13.2 Staff must ensure that they create a school environment where children and young people's safety is paramount and where unacceptable or unsafe behaviour is not tolerated. Staff must be aware and alert to incidents of online abuse between children, consensual

Staff must report all unauthorised absences to the DSL, who must make contact with the child or young person's parent/carer immediately to establish the child or young person's whereabouts. The DSL must inform the placing authority of a pupil's poor attendance.

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

17.4 Children and young people who are repeatedly missing from education are at particular risk of harm. Attempts must be made to talk to the child or young person about why they are missing from education. Records must be kept of those discussions. Any safeguarding information which the child or young person discloses must be shared **immediately** with the local authority. If the child or young person discloses immediate safeguarding concerns, the DSL must share this information with the police.

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

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

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

18.3 Schools must write and implement a local exploitation procedure which staff must be familiar with. All staff **must** read Outcomes First Group's Exploitation policy as well as refer to Keeping Children Safe in Education (2021).

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

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

18.6 Where there are low level concerns, i.e. where the behaviour towards a child does not meet the threshold of harm, the DSL must document the concerns on a chronology in order to establish a full picture of what is happening for the child or young person.

Radicalisation are shared **immediately** with the relevant Regional Director for Education and Care and Chair of Governors) and that staff have documented them appropriately.

21.0 Preventing Radicalisation

21.1 Outcomes First Group fully recognises its responsibility to have arrangements in place to safeguard and protect children from radicalisation. Section 26 of the Counterterrorism and Security Act 2015 places a statutory responsibility on schools to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the 'Prevent' duty.

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

21.3 All staff must be aware of the local procedures relating to reporting radicalisation concerns.

22.0 Children Requiring Support with their Mental Health

22.1 Outcomes First Group recognises that schools have an important role in supporting the health and wellbeing of children and young people. Mental ill-health can be an indicator of a child suffering or at risk of abuse, neglect or exploitation. All schools should have systems in place for identifying mental health problems and referring to appropriate agencies for additional support. This will ordinarily be with the consent of the child and their family. All details of concerns and any referrals or other support arranged for the child should be documented on the schools electronic recording system.

22.2 Schools can refer to the Mental Health and Behaviour in Schools guidance (2018) <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2> The guidance provides advice on how to create a whole school culture in promoting positive mental health outcomes for children and young people.

23.0 Physical Interventions

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

The intervention and the follow-up action must be recorded on the School's Electronic Recording System.

23.2 All staff must read and know the school's individual Physical Intervention Policy.

23.3 If a child or young person makes an allegation after a physical intervention, it is important that the member of staff writes down as much information as possible. Staff must complete

body maps immediately after the event and make an appropriate electronic record. Staff must also verbally inform the DSL (or deputy) as well as recording it onto the schools electronic recording system. **Medical attention must always be sought for the young person.** Staff must inform their parents or carers. Allegations of harm relating to physical interventions must be reported to the Regional Director for Education and Care, the Group Head of Safeguarding (anne-marie.delaney@ofgl.co.uk) Local Authority Designated Officer or equivalent.

24.0 Allegations against Staff

24.1 An allegation is any concern, complaint or disclosure that indicates a member of staff, agency staff or volunteer or has:

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

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

24.3 When a child makes an allegation about a member of staff, the member of staff receiving the complaint must:

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

The DSL must:

- take all allegations seriously regardless of whether a child or young person has made previous allegations and can speak to the Local Authority Designated Officer or equivalent and seek advice about next steps on the same day.
- Must report allegations to the Local Authority Designated Officer or equivalent within one working day.
- Ensure that they follow the Outcomes First Group's Managing Allegations Procedure.

24.4 Part four of Keeping Children Safe in Education (2021) outlines the importance of retaining oversight of any concerns or allegations about agency or supply staff, volunteers or any member of staff employed by a third party working in the school setting. Whilst the individual may not be employed by Outcomes First Group, **schools must ensure** that allegations are managed properly. KCSIE (2021) states *'In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.'*

Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools of colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation.'

24.5 If the allegation is regarding the Head Teacher/Principal then the Regional Director for Education and Care must be informed immediately. They will then seek advice from the Local Authority Designated Officer (or equivalent).

24.6 **All allegations made against staff must be reported to the Regional Director for Education and Care and HR and the Group Head of Safeguarding, and to safeguarding@ofgl.co.uk. Outcomes First Group recognises that managing allegations can be challenging and so will support with the process.**

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

25.0 Working with the Local Authority Designated Officer (or equivalent)

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

26.0 Whistleblowing

26.1 Safeguarding is everyone's responsibility. Outcomes First Group recognises that on occasion staff may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns that they may have. The Group also recognises that children will be unable to voice their concerns if they are in an environment where staff also fail to voice their concerns.

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

26.3 Outcomes First Group has an anonymous telephone support system (Safecall) where staff are able to share any concerns that they may have, safely and without fear of reprisal. All whistleblowing concerns will be taken seriously and treated as such.

26.4 Staff can call Safecall on **08009151571**, report online **www.safecall.co.uk/reports**, or email **outcomesfirstgroup@safecall.co.uk**

27.0 Covid-19 and disruption to schools

<https://learning.nspcc.org.uk/news/covid/undertaking-remote-teaching-safely>

<https://www.pshe-association.org.uk/guidance-teaching-pshe-remotely>

27.6 Digital Learning

Where possible digital learning options for children and young people will be made available if they are having to learn remotely. All staff should be mindful that the Outcomes First Group's and school's safeguarding policies & procedures and Code of Conduct & Ethics Policy continue to apply, at all times when working online or offline at any location.

27.6.1 Acorn Digital Learning have produced a Live Online Risk Assessment, and Student Remote Learning policy and template, that have been shared with all Outcomes First Group schools and can be utilised as required.

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

27.6.3 The guidelines for digital learning below must be followed:

- Ensure parents and carers are aware of online safety advice and resources such as [Thinkuknow](#) and [Safer Internet Centre](#)
- A link to [ParentInfo](#) should be on the school's website – this DfE backed website provides parents with up-to-date information about a range of topics.
- If staff are concerned about a comment made online by a pupil or the work they share, the staff member should take a screen shot and report it to the DSL via MyConcern / CPOMS (or the school's existing protocol as long as it is secure).
- Staff and pupils should be fully dressed and take into account the background/surroundings. Staff should use a communal area, and anything in the background that could cause concern or identify family members/ personal information, should be removed or a sheet should be used.
- The teacher may need to give guidance to pupils to remove items from view. If a pupil is inappropriately dressed or in an unsuitable setting (e.g. a bedroom) they must be removed from the video call.
- Staff must not enter into one-to-one tuition voice or video call with an individual pupil or student without SLT agreement. If there is a need for single pupil interaction, please ensure that a colleague is added to the call, or that a parent is present with the pupil
- If a staff member urgently needs to call a parent or pupil from their personal phone, the number must be withheld by dialling 141 first and a record of the call must be made (e.g. an email to the HSM, DH or DSL to explain the purpose of the call and any actions taken as a result of it)

