

Safeguarding Policy and Procedures

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First Response Children's Duty (Priority 1 referrals)

Telephone 0116 305 0005

Fax 0116 305 0011

Email childrensduty@leics.gov.uk

Address First Response Children's Duty
Room 100b
County Hall
Championship Way
Glenfield
LE3 8RF

All other referrals

<http://lrsb.org.uk/childreport>

Early Help – Request for Services

http://www.leics.gov.uk/index/children_families/early_help.htm

Family Information Service: 0116 3056545 Email: family@leics.gov.uk

All staff have the right to make a referral directly to LADO or Social Services if they have concerns about Safeguarding or if they feel that a concern they have previously raised is not being acted upon.

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1 Introduction

- 1.1 Invent Learning fully recognises the contribution it can make to protect children and support pupils in our provision. Staff understand that safeguarding is everyone's responsibility and this is a duty that we take seriously at Invent Learning. The aim of the policy is to safeguard and promote our pupils' welfare, safety and health by fostering an honest, open, caring and supportive climate. The pupils' welfare is of paramount importance and staff at Invent Learning maintain a professional attitude of 'it could happen here' where safeguarding is concerned. Where there are concerns about the welfare of a child, staff members will always act in the best interests of the child.
- 1.2 This policy is consistent with:
- the legal duty to safeguard and promote the welfare of children, as described in section 175 of the Education Act 2002 [or section 157 of the Education Act 2002 for independent schools and academies] and the Statutory guidance "*Keeping children safe in education – Statutory guidance for schools and colleges*", Sept 2023 and "*Working Together to Safeguard Children*", 2018.
 - the Leicestershire and Rutland Local Safeguarding Children Board (LSCB) Procedures, which contain procedures and guidance for safeguarding children

Types of abuse and neglect

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

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interest** of the child.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

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.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in

danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific safeguarding issue

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence/sexual assaults and sexting. Staff should be clear about Invent Learning's policy and procedures with regards to child on child abuse.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- bullying including cyberbullying
- children absent from education – also see Annex A
- child missing from home or care
- child sexual exploitation (CSE) – also see Annex A
- domestic violence – also see Annex A
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – also see Annex A

- forced marriage- also see Annex A
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults
- private fostering
- preventing radicalisation – also see Annex A
- relationship abuse
- sexting
- trafficking

Annex A contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff who work directly with children should read this. This can be found at the end of this document.

1.3 There are four main elements to our Child Protection Policy:

- **Prevention** (e.g. positive school atmosphere, teaching and pastoral support to pupils, safer recruitment procedures);
- **Protection** (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Child Protection concerns);
- **Support** (to pupils and school staff and to children who may have been abused);
- **Working with parents** (to ensure appropriate communications and actions are undertaken).

1.4 This policy applies to all staff, governors and visitors to Invent Learning. We recognise that child protection is the responsibility of all staff. We will ensure that all parents and other working partners are aware of our child protection policy by mentioning it in our school prospectus, displaying appropriate information in our reception and on the school website, by raising awareness at meetings with parents and through our safer recruitment process.

1.5 **Extended school activities**

Where the Managing Director provides services or activities directly under the supervision or management of school staff, the school's arrangements for child protection will apply. Where services or activities are provided separately by another body, the Governing Body will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and there are arrangements to liaise with the school on these matters where appropriate.

2 Safeguarding Commitment

- 2.1 Invent Learning adopts an open and accepting attitude towards children as part of its responsibility for pastoral care. Staff encourage children and parents to feel free to talk about any concerns and to see our provision as a safe place when there are difficulties. Children's worries and fears will be taken seriously and children are encouraged to seek help from members of staff.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication

- 2.2 Our alternative provision will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to;
- Ensure that children know that there are adults who they can approach if they are worried or are in difficulty;
- Ensure that any child with SEND who reports abuse will receive extra support and attention. This will require close liaison between the designated safeguarding lead (or deputy) and the person with oversight for SEND. Extra support and attention for these children will be considered, along with ensuring any appropriate support for communication is in place.
- Include in the curriculum activities and opportunities for PSHE/Citizenship which equip children with the skills they need to stay safe from abuse (including online), and to know to whom they can turn for help;
- Ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies;
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children, including identity, right to work, enhanced DBS criminal record and barred list (and overseas where needed), references, and prohibition from teaching. All staff, volunteers, supply staff will undergo a DBS check prior to starting with us. Contractors or other visitors who do not have a DBS certificate will be accompanied at all times whilst on the premises.

2.3 Safeguarding in the Curriculum

Preventative, age-appropriate, education plays a crucial role in teaching safeguarding to children and young people. It is most effective in the context of whole-provision approach that prepares students for life in modern Britain. Invent Learning has a clear set of values and standards, upheld and demonstrated throughout all aspects of our provision. These will be underpinned by our behaviour

policy, as well as by a planned programme of evidence based PHSE delivered and reinforced throughout the whole curriculum.

The following areas are among those addressed in PSHE and in the wider curriculum:

Bullying/Cyberbullying (including harmful online challenges)

Drugs, alcohol and substance abuse

E Safety / Internet safety

Stranger danger

Fire and water safety

Road safety

Diversity issues

Domestic Violence

Extremism and Radicalisation

Child-on-child abuse

Zero-tolerance culture of 'sexism, misogyny/misandry, homophobia, biphobic or sexual violence / harassment, LGBT inclusion'

Healthy and respectful relationships

Boundaries and consent

Stereotyping, prejudice and equality

Body confidence and self-esteem

The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage, female genital mutilation and how to access support.

What constitutes sexual harassment and sexual violence and why these are always unacceptable.

3 Roles and Responsibilities

3.1 General

All adults working with or on behalf of children at Invent Learning have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within the provision.

The names of the Designated Safeguarding Leads for the current year are listed at the start of this document.

3.2 Managing Director

In accordance with the Statutory Guidance "Keeping children safe in education" Sept 2023, the Managing Director will ensure that:-

- Invent Learning has a child protection/safeguarding policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly.
- Invent Learning operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore the Managing Director and Business Manager of Invent Learning will have undertaken Safer Recruitment Training.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers.

- There is a senior member (Managing Director) of Invent Learning who is designated to take lead responsibility for dealing with child protection (the “Designated Safeguarding Lead”) and there is also cover for this role.
- The Designated Safeguarding Lead undertakes effective Local Authority training (in addition to basic child protection training) and this is refreshed every two years.
- The Managing Director, and all other staff and volunteers who work with children undertake appropriate training which is regularly updated (at least every three years in compliance with the LSCB protocol); and that new staff and volunteers who work with children are made aware of the school’s arrangements for child protection and their responsibilities. The Local Authority leaflets, “Safer working in Education Settings” and “Education Child Protection” will be used as part of this induction.
- Any deficiencies or weaknesses brought to the attention of the Managing Director will be rectified without delay.
- There is an Independent body (see complaints Policy) that deals with any allegations of abuse made against the Managing Director, in liaison with the Local Authority Allegations Manager (LADO).
- Effective policies and procedures are in place and updated annually including a behaviour “code of conduct” and “low level concerns policy” for staff and volunteers. Information is provided to the Local Authority (on behalf of the LSCB) through the Annual Safeguarding Return.
- There is an individual member of the Governing Body who will champion issues to do with safeguarding children and child protection within the school, liaise with the Designated Safeguarding Lead, and provide information and reports to the Governing Body.
- Invent Learning contributes to inter-agency working in line with statutory guidance “Working Together to Safeguard Children” 2015 including providing a co-ordinated offer of early help for children who require this. Safeguarding arrangements take into account the procedures and practice of the local authority and the Local Safeguarding Children Board (LSCB).

3.3 Responsibilities of the Managing Director

The Managing Director of Invent Learning will ensure that:

- The policies and procedures adopted by the provision are effectively implemented, and followed by all staff;
- Sufficient resources and time are allocated to enable the Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children;
- Allegations of abuse or concerns that a member of staff or adult working at school may pose a risk of harm to a child or young person are notified to the Local Authority Allegations Manager
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner.

- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care Services or the Police.

3.4 Designated Safeguarding Lead

The responsibilities of the Designated Safeguarding Lead are found in Annex B of "Keeping children safe in education" and include:

- Considering whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- Provision of information to the LSCB/Local Authority on safeguarding and child protection in compliance with section 14B of the Children Act 2004.
- Liaison with the Governing Body and the Local Authority on any deficiencies brought to the attention of the Governing Body and how these should be rectified without delay.
- Referral of cases of suspected abuse to Specialist Services First Response Children's Duty (and/or Police where a crime may have been committed). Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately.
- Act as a source of support, advice and expertise within Invent Learning.
- To attend and contribute to child protection conferences when required.
- Ensure each member of staff has access to and understands Invent Learning child protection policy especially new or part-time staff who may work with different educational establishments;
- Ensure all staff have induction training covering child protection and staff behaviour and are able to recognise and report any concerns immediately they arise and to give Part 1 and Annex A of "Keeping children safe in education" to all staff;
- Keep detailed, accurate and secure written records of concerns and referrals;
- Obtain access to resources and effective training for all staff and attend refresher training courses every two years.
- Where children leave the provision, ensure their child protection file is handed to the Designated Safeguarding Lead and signed for in the new school/college as soon as possible.
- Maintain and monitor child protection records, including monitoring and acting upon individual concerns, patterns of concerns (e.g. children who repeatedly go missing) or complaints, in accordance with the section on "Records, Monitoring and Transfer" below.

- Annual full staff training and updating will be delivered by the DSL
- Open communication and updates will be shared with staff at least weekly, and on a daily basis where the situation requires.

4 Records, Monitoring and Transfer

- 4.1 Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within the school. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies.
- 4.2 Records relating to actual or alleged abuse or neglect are stored apart from normal pupil or staff records. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.
- 4.3 Child protection records are stored securely, with access confined to specific staff, eg Designated Safeguarding Leads and Managers.
- 4.4 Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon.
- 4.5 When children transfer from Invent Learning, their safeguarding records are also transferred. This will be done within 5 days. Safeguarding records will be transferred separately from other records and best practice is to pass these directly to a Designated Safeguarding Lead in the receiving provision *[or 6th form / FE college]*, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead and a photocopy kept. Files requested by other agencies e.g. Police should be copied.
- 4.6 DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

5 Support to pupils and Invent Learning staff

5.1 Support to pupils

Invent Learning recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children Invent Learning may be one of the few stable, secure and predictable components of their lives. Other children may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect. We will seek to provide such children with the necessary support and to build their self-esteem and confidence.

- 5.2 Invent Learning recognises that children sometimes display abusive behaviour themselves and that such incidents or allegations must be referred on for appropriate support and intervention.
- 5.3 Complaints or concerns raised by pupils will be taken seriously and followed up in accordance with the school's complaints process.
- 5.4 For children who have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff at Invent Learning are aware of how these experiences can impact on their mental health, behaviour and education and will promote positive health, wellbeing and resilience among children.
- 5.5 Support for Staff

As part of their duty to safeguard and promote the welfare of children and young people staff may hear information, either from the child/young person as part of a disclosure or from another adult that will be upsetting. Where a member of staff is distressed as a result of dealing with a child protection concern, he/she should in the first instance speak to the Designated Safeguarding Lead or Deputy about the support they require. The Designated Safeguarding Lead or Deputy should seek to arrange the necessary support.

If staff have a safeguarding concern or an allegation about another member of staff (including volunteers, supply staff or contractors) then this should be shared in accordance with Invent Learning's Low-level concerns policy.

6 Working with parents/carers

Invent Learning will:

- Ensure that parents/carers have an understanding of the responsibility placed on the provision and staff for child protection by setting out its obligations in Invent Learning prospectus.
- Undertake appropriate discussion with parents/carers prior to involvement of Children & Family Services Children's Social Care or another agency, unless to do so would place the child at risk of harm or compromise an investigation.
- communications with parents / carers should be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems Invent Learning use to filter and monitor online use.

7 Other Relevant Policies

- 7.1 Invent Learning's statutory responsibility for safeguarding the welfare of children goes beyond simply child protection. The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance:
- Behaviour Management
 - Staff Code of Conduct

- Racist incidents
- Anti-Bullying (including Cyberbullying)
- Physical Interventions/Restraint (DfE Guidances “Use of Reasonable Force” and “Screening, searching and confiscation”)
- Trips and visits
- First aid and the administration of medicines
- Health and Safety
- Sex and Relationships Education
- Equal Opportunities
- e-Safety
- Extended school activities
- Low level concerns

The above list is not exhaustive but when undertaking development or planning of any kind Invent Learning will consider the implications for safeguarding and promoting the welfare of children.

8 Recruitment and Selection of Staff

- 8.1 Invent Learning safer recruitment processes follow the Statutory Guidance: *Keeping children safe in education September 2023, Part Three: Safer recruitment*. See separate policy – Safer Recruitment.
- 8.2 Invent Learning will provide all the relevant information in references for a member of staff about whom there have been concerns about child protection / inappropriate conduct. Cases in which an allegation has been proven to be unsubstantiated, unfounded, false or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in a reference.
- 8.3 Invent Learning has an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an ongoing culture of vigilance. All new staff and volunteers receive a safeguarding induction and are briefed on the code of conduct for adults working with children. The Leicestershire County Council leaflets “Education Child Protection” and “Safer Working in Education Settings” are given to all staff and are the basis for the safeguarding induction.
- 8.4 In line with statutory requirements, every interview panel for school staff will have at least one member (teacher/manager or governor) who has undertaken safer recruitment training either online or by attending the local authority one day Safer Recruitment training course.
- 8.5 In addition, as part of the shortlisting process Invent Learning may consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened and are publicly available online, which Invent Learning might want to explore with the applicant at interview. Invent Learning will inform shortlisted candidates that online searches may be done as part of due diligence checks.
- 8.6 Staff and volunteers who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare relevant information - see statutory guidance: Disqualification under the Childcare Act 2006 (February 2015).

APPENDIX 1

PROCEDURE TO FOLLOW IN CASES OF POSSIBLE, ALLEGED OR SUSPECTED ABUSE, OR SERIOUS CAUSE FOR CONCERN ABOUT A CHILD

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A. General

- 1) The Local Safeguarding Children Board Procedures contain the inter-agency processes, protocols and expectations for safeguarding children. (Available on LSCB website www.lrsb.org.uk: The Designated Safeguarding Lead is expected to be familiar with these, particularly the referral processes.
- 2) It is important that all parties act swiftly and avoid delays.
- 3) Any person may seek advice and guidance from the First Response Children's Duty Professionals Consultation Line, particularly if there is doubt about how to proceed. Any adult, whatever their role, can take action in his/her own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.
- 4) Written records, dated and signed, must be made to what has been alleged, noticed and reported, and kept securely and confidentially.
- 5) In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents and relevant parties to help alleviate the concerns and effect an improvement for the child. This is appropriate where it is thought a child may be in need in some way, and require assessment to see whether additional support and services are required. An example might be where it is suspected a child may be the subject of neglect. In most cases the parents' knowledge and consent to the referral are expected, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent/carer of a referral that might put the child at risk, and in individual cases advice from Children's Social Care will need to be taken.

B. Individual Staff/Volunteers/Other Adults – main procedural steps

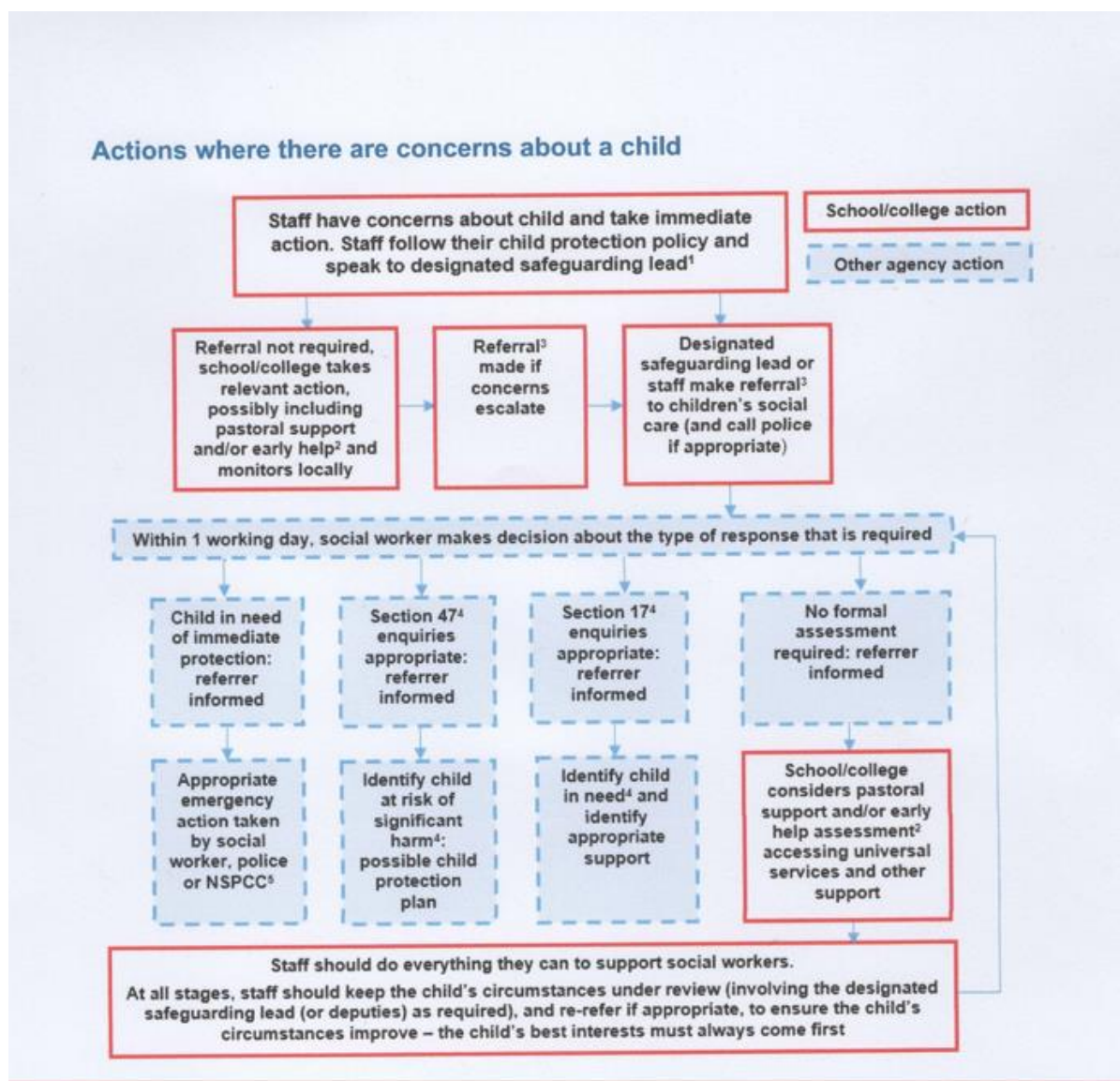
- 1) When a child makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine children, or promise confidentiality. Children making disclosures should be reassured and if possible at this stage should be informed what action will be taken next.
- 2) As soon as possible write a dated, timed and signed note of what has been disclosed or noticed, said or done and report to the Designated Safeguarding Lead in the school.
- 3) If the concern involves the conduct of a member of staff or volunteer, a visitor, a governor, a trainee or another young person or child, the manager must be informed.

- 4) If the allegation is about the Managing Director, the information should normally be passed to the Chair of Governors, Directors or the Local Authority Allegations Manager (LADO).
- 5) If this has not already been done, inform the child (or other party who has raised the concern) what action you have taken.

C. Designated Safeguarding Lead – main procedural steps

- 1) Begin a case file which will hold a record of communications and actions to be stored securely (see Section on Records, Monitoring and Transfer).
- 2) Where initial enquiries do not justify a referral to the investigating agencies, inform the initiating adult and monitor the situation. If in doubt, seek advice from the First Response professionals Consultation line.
- 3) Share information confidentially with those who need to know.
- 4) Where there is a child protection concern requiring immediate, same day, intervention from Children's Social Care (Priority 1), the First Response Children's Duty should be contacted by phone. Written confirmation should be made within 24 hours on the LSCB Agency Referral Form to Children's Social Care. All other referrals should be made using the online form (see link <http://lrsb.org.uk/childreport>).
- 5) If the concern is about children using sexually abusive behaviour, refer to the separate guidance.
- 6) If it appears that urgent medical attention is required arrange for the child to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the child has been taken to hospital.
- 7) Exceptional circumstances: If it is feared that the child might be at immediate risk on leaving invent learning, take advice from the First Response Professionals Consultation line (for instance about difficulties if the school day has ended, or on whether to contact the police). Remain with the child until the Social Worker takes responsibility. If in these circumstances a parent arrives to collect the child, the member of staff has no right to withhold the child, unless there are current legal restrictions in force (e.g. a restraining order). If there are clear signs of physical risk or threat, First Response Children's Duty should be updated and the Police should be contacted immediately.

D. Flowchart – Actions where there are concerns about a child



APPENDIX 2

PROCESS FOR DEALING WITH ALLEGATIONS AGAINST STAFF (DIRECTOR) AND VOLUNTEERS

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with children has:

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

Relevant documents:

- DfE “Keeping children safe in education: Statutory guidance for schools and colleges” September 2020 (part 4: Allegations of abuse made against teachers and other staff)

1) Individual Staff/Volunteers/Other Adults who receive the allegation:

- i. Write a dated and timed note of what has been disclosed or noticed, said or done.
- ii. Report immediately to the Manager.
- iii. Pass on the written record.
- iv. If the allegation concerns the conduct of a Manager, report immediately to the Managing Director. Pass on the written record. (If there is difficulty reporting to the Chair of Governors, contact the Allegations Manager, Safeguarding and Improvement Unit as soon as possible.)

2) Manager

- i. If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- ii. Before taking further action notify and seek advice from the LADO, Safeguarding and Improvement Unit on the same day.
- iii. You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
- iv. Report to First Response Children’s Duty if the LADO so advises or if circumstances require a referral concerning a child.
- v. Ongoing involvement in cases:
 - Liaison with the LADO
 - Co-operation with the investigating agency’s enquiries as appropriate.
 - Consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

- Possible referral to the DBS or NCTL, depending on the outcome.

Safeguarding concerns about the Managing Director should be reported straight to LADO

APPENDIX 3

LOW LEVEL CONCERNS POLICY

1.0 Purpose

- 1.1 This policy sets out a framework whereby staff are expected to report **all** concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working at Invent Learning. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the “Guidance for safer working practice for those working with children and young people in education settings” (May 2019) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.
- 1.2 The policy should be read in conjunction with the current statutory guidance – “Keeping Children Safe in Education” Part 4, Section 2.

2.0 Who does the policy apply to?

- 2.1 This policy applies to all adults working in or on behalf of Invent Learning (including supply staff, volunteers and contractors).

3.0 Definition of a low-level concern

- 3.1 A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a ‘nagging doubt’, that a person working in or on behalf of Invent Learning may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

Examples of such behaviour could include, but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to policy.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating children.

4.0 Reporting low-level concerns

- 4.1 Where a low-level concern has been identified this will be reported as soon as possible to the Managing Director. However, it is never too late to share a low-level concern if this has not already happened.
- 4.2 Where the Managing Director is not available, the information will be reported to the Designated Safeguarding Lead or Deputy (ie the most senior member of SLT acting in this role).

4.3 Low-level concerns about the Designated Safeguarding Lead will be reported to LADO.

5.0 Recording concerns

5.1 A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

5.2 Where concerns are reported verbally to the Managing Director a record of the conversation will be made by the Managing Director which will be signed, timed, and dated.

6.0 Responding to low-level concerns

6.1 Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Managing Director will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine whether the behaviour,
 - i) is consistent with the “Guidance for safer working practice for those working with children and young people in education settings” (May 2019): no further action will be required,
 - ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. either via the Performance Management Policy or Disciplinary Policy.
 - iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from HR. In this case the school’s Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.
 - iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and advice taken from HR. In this case the school’s Managing Allegations procedure within the Safeguarding Policy and Disciplinary Policy will be followed.
- Records will be made of, i) all internal conversations including any relevant witnesses, ii) all external conversations eg with the LADO iii) the decision and the rationale for it, iv) any action taken

7.0 Can the reporting person remain anonymous?

7.1 The person bringing forward the concern will be named in the written record. Where they request to remain anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required

8.0 Should staff report concerns about themselves (i.e. self-report)?

- 8.1 It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the “Guidance for safer working practice”. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

9.0 Where behaviour is consistent with the “Guidance for safer working practice” (May 2019)

- 9.1 Feedback will be given to both parties to explain why the behaviour was consistent with the “Guidance for safer working practice”.

10.0 Should the low-level concerns file be reviewed?

- 10.1 The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

11.0 References

- 11.1 Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

12.0 How long will this information be retained for:

- 12.1 This information will be retained until the individual leaves employment with Invent Learning.

APPENDIX 4

GUIDELINES FOR AVOIDING ALLEGATIONS OF ABUSE: FOR ALL STAFF MEMBERS

Whilst they may in common law be regarded as acting in loco parentis, Instructors and Managers at Invent Learning should remember that they are not able to take the place of parents in providing physical comfort. This is not to say that all physical contact is inappropriate, rather that the professional context demands circumspection and a sense of fitness for purpose.

Teachers of very young children of nursery and Key stage 1 age will naturally need to engage in more physical contact than teachers of older children. Comforting a distressed child who may just have started school will not be an unusual occurrence. Similarly, in the special school setting, some children may tend towards demanding physical attention. In such circumstances, the contact by the adult will be for re-assurance and may involve physical closeness (e.g. holding the child's hand or placing hands on the child's shoulders). Hugging and kissing would be inappropriate for other than the parent, even though the child may want to initiate it.

Administration of medicines and first aid requires careful codes of conduct and procedures. These should be laid down by local authority or health authority or in individual provision guidelines and followed meticulously. As a rule of thumb, administration of first aid should be undertaken by a qualified first aider. Where none is available, the minimum steps should be taken to ensure the child's safety and the emergency services should be called.

Invent Learning staff may sometimes be called upon to intervene physically if a child or children are in danger of injuring themselves or others. It is important that in such circumstances the minimum possible reasonable force is used. Where possible another colleague should be called upon to assist, both to minimise the risk of injury to the member of staff intervening and to act as witness that reasonable force and no more was used. After such an event a clear record of what took place should be made, including where possible statements from witnesses. The Managing Director should be informed.

One-to-one situations with pupils need to be carefully and consciously managed. Some teaching, as with peripatetic music staff, may often suggest one-to-one organisation. Where pupils can be paired for such lessons, it is preferable. Where this is not possible and in other situations of individual interviews with pupils, it is advisable to use a room with a window where others can see in or to leave the door open. If confidentiality makes this difficult, then another member of staff should be informed that the interview is taking place.

If a child becomes distressed, support and re-assurance should be offered through calming words rather than through physical contact. Staff should not become involved with children's personal problems beyond listening and being sensitive to them in order to refer the child to the most appropriate source of help or counselling.

APPENDIX 5

POLICY FOR THE USE OF CAMERAS AND MOBILE PHONES

To ensure the safety and welfare of the children in our care this policy outlines the protocol for the use of personal mobile phones and cameras in the school.

- All staff must ensure that their mobile phones, personal cameras and recording devices are stored securely during working hours on school premises or when on outings (this includes visitors, volunteers and students)
- Mobile phones must not be used in any teaching area in school or within toilet or changing areas
- Only Invent Learning equipment should be used to record classroom activities. Photos should be put on the school system as soon as possible and not sent to or kept on personal devices
- During Invent Learning outings nominated staff will have access to a school mobile which can be used for emergency or contact purposes
- All telephone contact with parents or carers must be made on the school phone and a note kept
- Parents or carers are permitted to take photographs of their own children during a school production or event. The school protocol requires that photos of other people's children are not published on social networking sites such as Facebook.

APPENDIX 6

Safeguarding pupils who are vulnerable to extremism and radicalisation

Invent Learning recognises the duties placed on us by the Counter Terrorism Bill (Sept 2016) to prevent our pupils being drawn into terrorism.

These include:

- Assessing the risk of pupils being drawn into terrorism (see Appendix 5)
- Working in partnership with relevant agencies under the LSCB procedures
- Appropriate staff training
- Appropriate online filtering

Invent Learning is committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs; the pupils are encouraged to develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.

There is a current threat from terrorism in the UK and this can include the exploitation of vulnerable young people, aiming to involve them in terrorism or to be active in supporting terrorism.

Invent Learning seeks to protect children and young people against the messages of all violent extremism including but not restricted to those linked to Islamic Ideology, Far Right / Neo Nazi / White Supremacist ideology etc. Concerns should be referred to the Single Point of Contact (SPOC) (usually a Designated Safeguarding Lead or Manager) who have local contact details for Prevent and Channel referrals. They will also consider whether circumstances require Police to be contacted.

APPENDIX 7**Radicalisation and Extremism (PREVENT) Risk Assessment**

Provision.....

	Yes/No	Evidence
Does Invent Learning have a policy?		
Does Invent Learning work with outside agencies on radicalisation and extremism e.g. Channel?		
Have staff received appropriate training?		
Has Invent Learning got a trained Prevent lead?		
Do staff know who to discuss concerns with? (Single point of contact - SPOC)		
Is suitable filtering of the internet in place?		
Do children know who to talk to about their concerns?		
Are there opportunities for children to learn about radicalisation and extremism?		
Have any cases been reported?		
Are individual pupils risk assessed?		
What factors make the school community potentially vulnerable to being radicalised? (e.g. EDL local base, extreme religious views promoted locally, tensions between local communities, promotion of radical websites by some pupils/parents)		
Comment on the school's community, locality and relevant history		
Risk evaluation	Low Medium High	Way Forward

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Date completed..... Signed.....

APPENDIX 8

Female Genital Mutilation

Section 5B of the Female Genital Mutilation Act 2003 and section 74 of the Serious Crime Act 2015 places a mandatory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. The mandatory reporting duty will commence in October 2015.

Teachers will follow the established safeguarding procedure by reporting any such concerns to the Designated Safeguarding Lead and a report will be made to the Police.

Annex A: Further information

Further information on a child absent from education

All children, regardless of their circumstances, are entitled to a full time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are absent from education in their area. Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education.

A child absent from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School and college staff should follow their procedures for unauthorised absence and for dealing with children that are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of being absent in future.

Schools and colleges should put in place appropriate safeguarding policies, procedures and responses for children who are absent from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage. Further information about children at risk of being absent from education can be found in the Children Absent from Education guidance.

Schools

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers. Schools must place pupils on the admission register at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend the school. If a pupil fails to attend on the agreed or notified date, the school should consider notifying the local authority at the earliest opportunity to prevent the child from being absent from education.

It is important that the admission register is accurate and kept up to date. Schools should regularly encourage parents to inform them of any changes whenever they occur. This can assist the school and local authority when making enquiries to locate children absent from education.

Schools should monitor attendance and address it when it is poor or irregular. All schools must inform the local authority of any pupil who fails to attend school regularly, or has for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

- the full name of the pupil;
- the full name and address of any parent with whom the pupil lives;
- at least one telephone number of the parent with whom the pupil lives;
- the full name and address of the parent with whom the pupil is going to live, and the date the pupil is expected to start living there, if applicable;
- the name of pupil's destination school and the pupil's expected start date there, if applicable; and
- the ground in regulation 8 under which the pupil's name is to be deleted from the admission register.

Schools and local authorities should work together to agree on methods of making returns. When making returns, the school should highlight to the local authority where they have been unable to obtain the necessary information from the parent, for example in cases where the child's destination school or address is unknown. Schools should also consider whether it is appropriate to highlight any contextual information of a vulnerable child who is absent from education, such as any safeguarding concerns.

It is essential that schools comply with these duties, so that local authorities can, as part of their duty to identify children of compulsory school age who are absent from education, follow up with any child who might be at risk of not receiving an education and who might be at risk of being harmed, exploited or radicalised.

The department provides a secure internet system – school2school – to allow schools to transfer pupil information to another school when the child moves. All local authority maintained schools are required, when a pupil ceases to be registered at their school and becomes a registered pupil at another school in England or Wales, to send a Common Transfer File (CTF) to the new school. Academies (including free schools) are also strongly encouraged to send CTFs when a pupil leaves to attend another school. Independent schools can be given access to school2school by the department.

The school2school website also contains a searchable area, commonly referred to as the 'Lost Pupil Database', where schools can upload CTFs of pupils who have left but their destination or next school is unknown or the child has moved abroad or transferred to a non-maintained school. If a pupil arrives in a school and the previous school is unknown, schools should contact their local authority who will be able to search the database.

Colleges

Where a college is providing education for a child of compulsory school age, the college shall work collaboratively with the appropriate local authority in order to share information about the attendance and/or absences of that child as the local authority deems necessary, as set out in departmental advice Enrolment of 14 to 16 year olds in full time further education. The college should also inform the relevant local authority immediately if that child is removed from the roll so that the local authority can as part of their duty identify children of compulsory school age who are missing education.

Further information on child sexual exploitation

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

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

Domestic Violence

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

Further information on so-called 'honour based' violence

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Indicators

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

Actions

If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since that requires a different approach (see following section), with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk

Further information on preventing radicalisation

Protecting children from the risk of radicalisation should be seen as part of schools' and colleges' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

Prevent

From 1 July 2015, specified authorities, including all schools (and, since 18 September 2015, all colleges) as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the Revised Prevent duty guidance: for England and Wales are specifically concerned with schools (but also cover childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools to have distinct policies on implementing the Prevent duty.
- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.
- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Schools should ensure that children are safe from terrorist and extremist material when accessing the internet in schools.

The department has also published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

The Government has launched educate against hate, a website designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people. The website provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.