

# **TBAC**

## **Child Safeguarding Policy Framework**

Date Created: June 2017  
Review Date: June 2018

**Child Safeguarding Policy Framework for Nottingham Schools**  
(Nottingham schools child safeguarding policy framework, 2016)

Dear Colleague

We are providing you with an updated child safeguarding policy framework for Nottingham schools due to the publication by the Department for Education of an updated Keeping Children Safe in Education in September 2016.

To use this suggested framework you will need to also take into account the following documents:

- Keeping Children Safe in Education 2016
- LSCB procedures, 2014
- Working Together to Safeguard Children 2015
- Early years and Foundation Stage Guidance 2012

The Centre Manager/designated staff and directors need to adapt the framework before it can be adopted as the centre's policy.

Please contact the Safeguarding in Education Team via the email address [Safeguardingineducation@nottinghamcity.gov.uk](mailto:Safeguardingineducation@nottinghamcity.gov.uk), or phone 0115 8763584, if you require any further support and/or guidance in relation to safeguarding.

Yours sincerely

**Child Safeguarding Policy for schools in Nottingham  
September 2016**

**TBAC Centre**

**Child Safeguarding Policy**

The policy reflects current legislation, accepted best practice and complies with the government guidance: Working Together to Safeguard Children April 2015 and Keeping Children Safe in Education September 2016.

This policy was written and adopted on: 01 June 2017. *It has been approved by the Governing Body and Senior Leadership Team.*

It is due for review in twelve months on: 01 June 2018

Other policies that may need to be taken into account are:

- *Anti-bullying and discrimination*
- *PSHE*
- *Drugs*
- *confidentiality*
- *behaviour and attendance*
- *special needs*
- *health and safety*
- *safer recruitment*
- *physical intervention*
- *E-safety*
- *Management of Allegations*
- *Intimate Care*
- *Touching*
- *Policy for the use of Mobile Phones and Cameras in Early Years and Foundation stage*
- *Whistleblowing policy*
- *Staff Conduct policy (Code of Conduct)*
- *Visitors policy*

Schools (including independent schools, non-maintained special schools, Academies and free schools) and Further Education (FE) institutions should give effect to their duty to safeguard and promote the welfare of their pupils under section 175/157 the Education Act 2002 and where appropriate under the Children Act 1989 by:

- Creating and maintaining a safe learning environment for children and young people; and,
- Identifying where there are child welfare concerns and taking action to address them, in partnership with other organisations where appropriate.

Governing bodies and proprietors should consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social health and economic education (PSHE), and/or - for maintained schools and colleges - through sex and relationship education (SRE).

## Working Together To Safeguard Children 2015 & Keeping Children Safe in Education 2016

### Statutory duties that apply to schools

Schools should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children, including:

- ensuring that the school or college contributes to inter-agency working in line with statutory guidance *Working Together to Safeguard Children 2015*. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to, for example, children subject to child protection plans and children looked after;
- a clear line of accountability for the commissioning and/or provision of services designed to safeguard and promote the welfare of children;
- a senior member of staff to take leadership responsibility for the centre's safeguarding arrangements;
- a culture of listening to children and taking account of their wishes and feelings and ensuring there are systems in place for children to express their views and give feedback;
- ensuring there are procedures in place to respond robustly to allegations, including those relating to children harming, or allegedly harming other children and allegations against staff and volunteers;
- arrangements which set out clearly the processes for sharing information, with other professionals and with the Local Safeguarding Children Board (LSCB);
- a designated professional lead for safeguarding. Their role is to support other members of staff, to recognise the needs of children, including recognising and responding to possible abuse or neglect. Designated leads' roles should always be explicitly defined in job descriptions. They should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively;
- safe recruitment practices for individuals whom the organisation will permit to work regularly with children (p.19-20 Keeping Children Safe in Education 2016) including policies on when to obtain a relevant Disclosure and Barring Scheme (DBS) check;
- schools and colleges must keep a single central record of DBS checks and training undertaken (p.27-28 Keeping Children Safe in Education 2016). The record must cover the following people:
  - all staff (including supply staff) who work in the centre; in colleges, this means those providing education to children
  - all others who work in regular contact with children in the centre or college, including volunteers
  - for independent schools, including academies and free schools, all members of the proprietary body.
- it is the centre's responsibility to ensure that all the staff they employ in specified early or later years childcare have had the appropriate checks. This includes ensuring that staff working in early and later years settings are suitable to do so. The DfE issued updated guidance for schools in February 2015, entitled Disqualification Under the Childcare Act 2006 of teachers and other school staff working in early or later years provision, or those who are directly concerned with the management of such provision. A person is automatically disqualified if they live in the same household as another person who is disqualified or in a household where a disqualified person is employed. The categories of

staff in nursery, primary or secondary school settings covered by regulation 13 include staff who:

- work in the early years provision (including teaching staff and support staff working in school nursery and reception classes)
- work in later years provision for children who have not reached the age of eight, including before-school settings such as breakfast clubs and after-school provision
- are directly concerned with the management of such early or later years provision.
- employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role;
- staff should be given a mandatory induction, which includes familiarisation with safeguarding responsibilities and procedures to be followed if anyone has any concerns about a child's safety or welfare. Staff in schools and colleges should ensure that **all staff read at least part one of Keeping Children Safe in Education 2016**. There should then be an ongoing programme of refresher training and updates to staff/volunteers about key safeguarding issues, e.g. information shared at the Designated Safeguarding Leads network meeting. Such updates should be at least annual;
- ensure there is an effective child safeguarding policy in place together with a staff behaviour policy (code of conduct) and a whistleblowing policy. These should be provided to all staff - including temporary staff and volunteers - on induction;
- all professionals should have regular reviews of their own practice to ensure they improve over time;
- the designated lead professional for safeguarding should maintain comprehensive records, which should be used to inform a review of the support and level of concern child's circumstances whenever new information arises;
- all schools and colleges have to be compliant with the requirements of the LSCB in Nottingham and this includes engagement in the Serious Case Review process;
- the Nottingham City Safeguarding Children Board (NCSCB) requires all schools to complete an annual safeguarding audit and be engaged in multi-agency processes and Serious Case Reviews (See Working Together to Safeguard Children 2015 (Chapter 2 p53), to be read in conjunction with DfE Keeping Children Safe in Education 2016);
- clear policies in line with those from the LSCB for dealing with allegations against people who work with children, in either a paid or voluntary capacity. An allegation may relate to a person who works with children who 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 they may pose a risk of harm to children

In addition:

The Designated Officer (previously known as the Local Authority Designated Officer) is to be involved in the management and oversight of individual cases where there are allegations made against people who work with children. The Designated Officer will provide advice and guidance to schools, liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, and are consistent with a thorough and fair process:

- any allegation should be reported immediately to the Centre Manager or the Principal of the centre. Where the allegation relates to the Centre Manager or Principal it should be reported to the Chair of Governors or equivalent. The Designated Officer should be informed within one working day of all allegations that come to an employer's attention or that are made directly to the police; and
- if an organisation removes an individual (paid worker or unpaid volunteer) from work such as looking after children (or would have, had the person not left first) because of a concern that the person may pose a risk of harm to children, the organisation must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.

In addition to these duties, which apply to centres, further safeguarding duties are also placed on them through other statutes. The key duties that fall on schools are set out below.

### **Schools and colleges**

*Section 175 of the Education Act 2002 places a duty on local authorities (in relation to their education functions and governing bodies of maintained schools and further education institutions, which include sixth-form colleges) to exercise their functions with a view to safeguarding and promoting the welfare of children who are pupils at a school, or who are students under 18 years of age attending further education institutions. The same duty applies to independent schools (which include Academies and free schools) by virtue of regulations made under section 157 of the same Act.*

*In order to fulfil their duty under sections 157 and 175 of the Education Act 2002, all educational settings to whom the duty applies should have in place the arrangements as set out above. In addition schools should have regard to specific guidance given by the Secretary of State under sections 157 and 175 of the Education Act 2002.*

## Introduction

At **TBAC Centre**, the Directors and staff fully recognise the contribution the centre makes to safeguarding children. We recognise that the safety and protection of all pupils is of paramount importance and that all staff, including volunteers, have a full and active part to play in providing early help protecting pupils from harm. We believe that the centre should provide a caring, positive, safe and stimulating environment which promotes all pupils' social, physical, emotional and moral development. In delivering this ambition we will adhere to the principles set out in Nottingham's Family Support Strategy and NCSCB Policy, Procedures and Practice Guidance.

Ultimately, effective safeguarding of children can only be achieved by putting children at the centre of the system, and by every individual and agency playing their full part, working together to meet the needs of our most vulnerable children, in line with Working Together 2015 and Keeping Children Safe in Education 2016.

### The aims of this policy are to:

- confirm that the pupils' development is supported in ways that will foster security, confidence and independence
- raise the awareness of teachers, non-teaching staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse
- confirm the structured procedures to be followed by all members of the centre community in cases of suspected harm or abuse
- emphasise the need for good levels of communication between all members of staff and those with designated responsibility for child safeguarding, health and safety and other safeguarding responsibilities
- emphasise the importance of maintaining and implementing appropriate safeguarding policies, procedures and arrangements of those service providers who use the centre's premises through extended centres or provide any other before and after centre activities
- highlight the connection between the safeguarding Policy and the centre's policy for safe recruitment of staff and volunteers, and for managing allegations
- confirm the working relationship with Children and Families Direct, the NCSCB and other agencies and, where appropriate with similar services in neighbouring authorities.

## Responsibilities

### i. The governing body:

- has trained link governor(s) for:  
Child safeguarding, named: Nigel Best  
Who will attend training/updates at least every three years and will also receive the regular safeguarding updates referred to above  
looked after children, named: Errol Brown.....
- will ensure a member of the governing body is nominated to liaise with the local authority and/or partner agencies on issues of child protection in relation to safeguarding and in the event of allegations of abuse made against the Centre Manager, the Principal of a college or proprietor or member of governing body of an independent school.
- will ensure that the centre has a child safeguarding policy, single central record, staff conduct policy and procedures in place, operates safe recruitment procedures, makes appropriate checks on staff and volunteers and has procedures for dealing with allegations against staff and volunteers that all comply in accordance with NCSCB.

- will ensure that schools and colleges create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might pose a risk to children (Part three: Safer Recruitment, Keeping Children Safe in Education 2016).
- has appointed a member of staff of the centre or college's leadership team to the role of designated safeguarding lead. This individual is .....
- will ensure the centre/college keeps an up to date single central record of pre-employment checks, specifying when the check was made and when it will be renewed.
- monitors the adequacy of resources committed to child safeguarding, and the staff and governor training profile
- recognises that neither it, nor individual governors, have a role in dealing with individual cases or a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against staff)
- ensure that the child safeguarding policy is available to parents and children on request
- will ensure this policy and practice complements other policies e.g. anti-bullying including cyber bullying, health and safety, to ensure an integrated model of safeguarding operates across the centre.

**ii. The Centre Manager will ensure that:**

- the policies and procedures adopted by the Directors are followed by all staff
- the policy will be updated annually, and be available publicly either via the centre or college website or by other means.
- designated staff review policy when the NCSCB update their policies and procedures
- sufficient resources and time are allocated to enable the designated persons and other staff to discharge their responsibilities including taking part in strategy discussions and other multi-agency meetings, to contribute to the assessment and support of children and young people, and be appropriately trained.
- a single central database of all staff and volunteers, and their safeguarding training dates is maintained and that this list confirms that all staff and those volunteers who meet the specified criteria have had a DBS check, when this check was made and when it will be renewed.
- all staff and volunteers feel able to raise their concerns about poor and unsafe practice in regard of pupils, and such concerns are addressed in a timely manner in accordance with agreed policies.
- centre staff are sensitive to signs that may indicate possible safeguarding concerns. This could include, for example, poor or irregular attendance, persistent lateness, children missing from education, particularly where there are concerns regarding the potential for forced marriage or female genital mutilation.
- he/she undergoes child safeguarding training which is updated regularly, in line with advice from the NCSCB.
- a visitor's policy is in place that puts the safeguarding of pupils at the centre and is applied to all visitors irrespective of their status.
  - All visitors to the centre will be asked to bring formal identification with them at the time of their visit (unless they are named on the approved visitors/contractors list as set out below).
  - Once on site, all visitors must report to reception first. No visitor is permitted to enter the centre via any other entrance under any circumstances.
  - At reception, all visitors must state the purpose of their visit and who has invited them. They should be ready to produce formal identification upon request.
  - All visitors will be asked to sign the Visitors Record Book which is kept in reception at all times making note of their name, organisation, who they are visiting and car registration.



- All visitors will be required to wear an identification badge – the badge must remain visible throughout their visit.
- Visitors will then be escorted to their point of contact OR their point of contact will be asked to come to reception to receive the visitor. The contact will then be responsible for them while they are on site. The visitor must not be allowed to move about the site unaccompanied unless they are registered on the Approved Visitor List (to be on this list, the person must have a current clear DBS check and children's barred check with a copy of this registered on the centres central record. They must then follow the procedures above e.g. sign into the visitors book and enter the premises via reception).

### **Allegations against the Centre Manager**

Where an allegation is made against the Centre Manager, Principal or equivalent, the Chair of the Governing Body, or equivalent, must be informed as well as the Designated Officer (LADO) **0115 8762302**.

### **iii. The trained designated leads (Centre Manager/senior managers) for child safeguarding:**

- 1 Nigel Best
- 2 Errol Brown

### **Will:**

- have their roles explicitly defined in their job descriptions
- be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively
- Undergo updated child safeguarding training every two years.
- Liaise with relevant agencies in accordance with the NCSCB procedures when referring a pupil where there are concerns about possible abuse or harm
- where there are concerns about a member of staff's suitability to work with children, contact the Designated Officer (LADO)
- be able to access the contents of the NCSCB procedures and Personnel procedures and make these accessible to all staff
- ensure all staff, including supply staff, visiting professionals working with pupils in the centre and volunteers are informed of the names and contact details of the designated leads and the centre's procedures for safeguarding children
- support staff who attend strategy meetings, looked after reviews and/or case conferences
- support staff and volunteers who may find safeguarding issues upsetting or stressful by enabling them to talk through their anxieties and to seek further support from the centre leadership group or others as appropriate
- ensure involvement of other designated leads e.g. where there are concerns about a pupil who is 'looked after'
- support staff to reflect on the information they hold about children and provide an alternative perspective on issues in order to promote a better understanding of what may or may not be concerning

### Designated leads will ensure that:

- written records of concerns are kept, even if there is no immediate need for referral; and monitored using the Common Assessment Framework (CAF) or Priority Families Assessment
- all child protection records are marked as such and kept securely locked, and if these are stored electronically, that they are differently password protected from the pupils' other files, and accessible only by the Head teacher/designated leads
- pupil records are kept separately, and marked as appropriate to indicate other confidential records are being held elsewhere
- all absence letters are dated and clearly signed by a teacher/tutor, and that if there are concerns about attendance and a pupil's wellbeing and safety, the Education Welfare Officer is contacted
- phone calls about absences are similarly logged and dated
- the children missing education- statutory guidance for local authorities 2016 is adhered to
- Where a pupil is subject to a Child Protection Plan, and is absent without explanation for two days, their key worker in Children's Social Care is contacted.
- Records are monitored for patterns of what, when taking in isolation would appear to be low level concerns, but when viewed together indicate a pattern which requires further action.
- where there are existing concerns about a pupil, and they transfer to another school in this authority, a copy of information held is transferred securely and confidentially e.g. a CAF is forwarded under confidential cover and separate from the pupil's main file to the designated lead for child safeguarding in the receiving school
- where a pupil has a **child protection plan** or there are ongoing child protection enquiries and transfers to another school;
  - the designated lead for Safeguarding is informed immediately
  - their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file.

### iv. The staff

All staff, teaching and non-teaching, volunteers and others working in the centre need to:

- Read Part 1 of Keeping Children Safe in Education
- be aware that to safeguard children, they have a duty to share information with the designated leads, and through the designated lead, with other agencies
- be aware that despite the requirement to share information with designated leads they can make their own referral to Children's Social Care, e.g. in urgent situations.
- be alert to signs and symptoms of harm and abuse. Further information regarding potential indicators of abuse, including specific information about risks such as Female Genital Mutilation and Forced Marriage is available on the NCSCB webpage
- know how to respond to their duty when they have concerns or when a pupil discloses to them and to act
- know how to record concerns and what additional information may be required
- undergo child safeguarding training which is updated regularly in line with advice from the NCSCB, (whole staff training every three years)
- Recognise that abuse and neglect can happen in any setting and maintain an attitude of 'it could happen here'
- familiarise themselves with "What to do if you're worried that a child is being abused: Advice for practitioners' guidance" (2015)

## Reporting concerns to the designated leads

Any concern should be discussed in the first instance with *one of the designated leads or in their absence the Centre Manager*, as soon as possible. **If at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care or the police immediately. Anybody can make such a referral.**

## Immediate response to the pupil

It is vital that our actions do not harm the pupil further or prejudice further enquiries, for example:

- listen to the pupil, if you are shocked by what is being said, try not to show it
- it is OK to observe bruises but not to ask a pupil to remove their clothing to observe them
- if a disclosure is made,
  - Accept what the pupil says
  - Stay calm, the pace should be dictated by the pupil without them being pressed for detail by asking leading questions such as "what did s/he do next?" It is your role to listen - not to investigate
  - Use open questions such as "is there anything else you want to tell me?" or "yes?" or "and?"
  - Be careful not to burden the pupil with guilt by asking questions like "why didn't you tell me before?"
  - acknowledge how hard it was for the pupil to tell you
  - Do not criticise the perpetrator, the pupil might have a relationship with them
  - Do not promise confidentiality, reassure the pupil that they have done the right thing, explain whom you will have to tell (the designated lead) and why; and, depending on the pupil's age, what the next stage will be. It is important that you avoid making promises that you cannot keep such as "I'll stay with you all the time" or "it will be all right now".

## Recording information

- Make some brief notes at the time or immediately afterwards; record the date, time, place and context of disclosure or concern, facts and not assumption or interpretation. Your name and role should be included.
- If it is observation of bruising or an injury try to record detail, e.g. "right arm above elbow". Do not take photographs.
- Note the non-verbal behaviour and the key words in the language used by the pupil (try not to translate into 'proper terms').
- It is important to keep these original notes and pass them on to the designated member of staff who may ask you to write a referral.

## Supporting pupils

- The staff and governors recognise that a child or young person who is abused or witnesses violence may find it difficult to develop and maintain a sense of self-worth. We recognise that in these circumstances pupils might feel helpless and humiliated, and that they might feel self-blame.
- We recognise that this centre might provide the only stability in the lives of pupils who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a pupil in these circumstances might range from that which is perceived to be normal to aggressive or withdrawn.
- The centre will support all pupils by: discussing child protection cases with due regard to safeguarding the pupil and his or her family; supporting individuals who are, or are thought to be, in need or at risk in line with NCSCB procedures; encouraging self-esteem

and self-assertiveness; challenging and not condoning aggression, bullying or discriminatory behaviour; promoting a caring, safe and positive environment.

- We recognise that the provision of the right help at the right time is a key element of our wider safeguarding responsibilities. This includes the provision of Early Help either directly through the centre or by signposting to other local services, as set out in Nottingham City's Family Support Strategy. Where a child is receiving early help support we will continue to monitor this to make sure it is having the required impact. Where there is no evidence of this impact we will consider other alternatives, which may include seeking specialist support.

### **Confidentiality**

- The personal information about all pupils' families is regarded by those who work in this centre as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality
- Staff understands that they need know only enough to prepare them to act with sensitivity to a pupil and to refer concerns appropriately. The designated leads and the Centre Manager will disclose information about a pupil to other members of staff on a need to know basis only. It is inappropriate to provide all staff with detailed information about the pupil, incidents, the family and the consequent actions.

Staff must be aware that:

- they cannot promise a pupil complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the pupil or other pupils safe
- Where there are concerns about a pupil's welfare relevant agencies need to be involved at an early stage. If a member of staff or a volunteer has concerns about a pupil's welfare, or if a pupil discloses that s/he is suffering abuse or reveals information that gives grounds for concern, the member of staff must speak to their designated lead with a view to passing on the information.

### **Working with parents/carers**

- Parents and carers play an important role in protecting their children from harm.
- In most cases, the centre will discuss concerns about a pupil with the family and, where appropriate, seek their agreement to making referrals to Children and Families Direct.
- Where there are any doubts, the designated lead should clarify with Children and Families Direct whether, and if so when and by whom, the parents should be told about the referral. Alternatively they could ring the Consultation Line in Children's Duty to discuss this case. The number for this is **07711189544**
- The pupil's views will be considered in deciding whether to inform the family, particularly where the pupil is sufficiently mature to make informed judgments about the issues, and about consenting to that.

*"Children want to be respected, their views to be heard, to have stable relationships with professionals built on trust and for consistent support provided for their individual needs. This should guide the behaviour of professionals. Anyone working with children should see and speak to the child; listen to what they say; take their views seriously; and work with them collaboratively when deciding how to support their needs." Working Together 2015*

- The centre aims to help parents understand that the centre, like all others, has a duty to safeguard and promote the welfare of all pupils. The centre may need to share information and work in partnership with other agencies when there are concerns about a pupil's welfare.

## Looked After Children

Supporting children in care is a key priority for our centre. We recognise that the needs of this group of children can only be effectively met when all agencies work together. To ensure we have a coordinated approach to meeting the needs of children in care who attend our centre we have a designated lead, who is **Nigel Best**

### Prevention in the Curriculum

- The centre recognises the importance of developing pupils' awareness of behaviour that is unacceptable towards them and others, and how they can help keep themselves and others safe.
- The PSHE programme *in each key stage* provides personal development opportunities for pupils to learn about keeping safe and who to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, pupils are taught to, for example:
  - safely explore their own and others' attitudes
  - recognise and manage risks in different situations and how to behave responsibly
  - judge what kind of physical contact is acceptable and unacceptable
  - recognise when pressure from others (including people they know) threatens their:
    - personal safety and well-being and develop effective ways of resisting pressure;
    - including knowing when and where to get help
  - use assertiveness techniques to resist unhelpful pressure.
  - How to keep safe on-line
  - The risks associated with sharing indecent images of, or information about, themselves. This is something that is often referred to as Sexting. Research indicates that this is increasingly associated with concerns such as sexual exploitation. Our work in this area is based on the guidance set out in Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People.

### Particularly Vulnerable Groups

Some children and young people may be particularly vulnerable to abuse and harm. This includes for example privately fostered children, children with a disability, children with communication needs. Certain forms of behaviour can also increase the vulnerability of a young person such as drug or alcohol misuse. The designated safeguarding lead should be aware of the range of guidance that is available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local (NCSCB) procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm.

### Child Sexual Exploitation

The sexual exploitation of children and young people (CSE) under 18 is defined as that which: 'involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have

power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.' (Department for Education, 2012)

Child sexual exploitation is a form of abuse which involves children (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity. Schools are well placed to prevent, identify and respond to children at risk of sexual exploitation.

### ***Who is at risk?***

Child sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people.

In all its forms, CSE is child abuse and should be treated as a child safeguarding issue.

### **Preventing Radicalisation**

Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counter-terrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all schools to respond when they become concerned that a child is being, or is at risk of, becoming radicalised. Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk and that staff are appropriately trained to look out for signs of radicalisation. Also schools will be monitored to ensure they are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programmes to challenge extremist ideology.

Statutory guidance has been published and is available here:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

If you have any concerns about individuals who may be being drawn into support for extremist ideology, please contact the Prevent Team [prevent@nottinghamshire.pnn.police.uk](mailto:prevent@nottinghamshire.pnn.police.uk) who will then contact you to discuss whether a referral should be made. Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.

### **Female Genital Mutilation**

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

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

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Potential indications that FGM may have already taken place may include:

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

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

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and Children's Social Care. Although the duty does not apply in relation to at risk or suspected cases never the less this is still something that must be reported to social care.

## **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

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

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

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the centre. However, it should be clear to the centre who has parental responsibility.

Centre staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the local authority.

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

## **Peer on Peer abuse**

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting.

At TBAC we believe that all children have a right to attend school (the centre) and learn in a safe environment. Children should be free from harm by adults in the centre and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the centre's Behaviour Policy.

Occasionally, allegations may be made against students by others in the centre, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Where this is the case we will follow the processes set out in the policy above. In addition we will be mindful of the fact that the pupil against whom the allegation has been made may also be vulnerable and need additional support and that their behaviour could be an indicator that they themselves are experiencing abuse, or have done so.

## **Children who Self-harm**

Staff should always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary age child has self-harmed serious consideration must be given to whether there are other underlying factors, including abuse. All such cases should be discussed with children's social care.

Even in those unusual cases where a primary age child is thought to have self-harmed it is important to recognise that this behaviour is an indicator of emotional distress and the child will need support to address this.

## **Children with continence issues**

Having control over continence is a developmental skill, and like other skills, children will attain it at different ages. Bedwetting (also known as nocturnal enuresis) is common and very few children will wet the bed on purpose. Bedwetting and daytime continence issues can have a significant impact on a child's behaviour and wellbeing. It can also be stressful for the parents or carers.

When supporting the child and their family, the emphasis must be on normalisation, no blame, no shame and strictly no punishments. Children should not be held responsible for their continence issues - rewards for dry nights are therefore unhelpful. NICE guidelines make it clear that maltreatment should be considered if a child is consistently reported to be deliberately wetting themselves, or the parents or carers are repeatedly punishing the child for their continence issues despite professional advice that it is involuntary.



## Professional development

- The governors recognise that all staff and volunteers who work with pupils aged up to 18 years need to have appropriate child safeguarding training that equips them to recognise and respond to pupil welfare concerns.
- We will ensure staff are given mandatory induction, which includes familiarisation with child safeguarding policy, part 1 of Keeping Children Safe in Education, staff behaviour policy, the designated leads in the centre, their responsibilities and procedures to be followed.
- The training, including multi-agency training, in the last 3 years undertaken by staff and governors to ensure their knowledge and skills are up to date includes:
  - *Add list here*
- A report of the centre's training needs assessment is presented to the directors annually so that they can ensure that training is appropriately provided for all staff. This report is also shared with staff to enable them to contribute to the development of safeguarding practice in the centre
- A training register is kept to indicate when staff and governors have been trained and this in turn informs the *annual* report to governors.
- Safer recruitment training has been attended by:
  - **Errol Brown..... Date July 2017.....**
  - ..... **Date.....**

## Training

Regular training and discussion within the centre environment is important and should be led by the Designated Leads for safeguarding.

### Timelines for training:

- Designated Safeguarding Lead training: refreshed **within every two years** (statutory requirement).
- Whole centre training: To be refreshed **within every three years** as agreed with NCSCB  
The above training is available through the Safeguarding in Education Service  
[safeguardingineducation@nottinghamcity.gov.uk](mailto:safeguardingineducation@nottinghamcity.gov.uk)
- Safer recruitment training: Through the DfE on-line (under review)

All staff, centres and Governing bodies should be open to new learning and keep up to date with changes made to national and local safeguarding policy, procedure and guidance including that provided by our safeguarding partners.

Schools need to evaluate and demonstrate how well they fulfil their statutory responsibilities and exercise professional judgment in Keeping Children Safe as outlined in Keeping Children Safe in Education 2016.

### Schools and Partnerships

Schools invest time and other resources in partnership activity and this investment should be aimed at improving outcomes for pupils. The Local Authority actively promotes the benefits to schools of partnerships and in this case to safeguard and improve the outcomes for potentially vulnerable pupils. Examples of this are:

- **Parental E-learning (free): Child Sexual Exploitation** is a high profile issue. Secondary schools and academies are asked to promote this e-learning with their parents and carers as it is an opportunity to improve their awareness in identifying and responding to child sexual exploitation from a preventative or early intervention perspective.  
<http://www.paceuk.info/the-problem/keep-them-safe/>
- **Pint Size Theatre:** Secondary Schools and Academies in Nottingham can access a performance of Pintsized Theatre's 'LUVU2' production. It is an interactive play aimed at raising awareness of Child Sexual Exploitation (CSE) with young people aged 13-14 (year 9). Contact is via email [www.pintsize theatre.co.uk](http://www.pintsize theatre.co.uk) or Tel: 0115 8419853.
- **NSPCC Child line Project:** (funded through the DfE) The project is free of charge to all primary schools and pupils in Years 5 & 6. Raising awareness through interactive classroom sessions with trained NSPCC staff, they come into schools, provide an assembly and workshops to raise the awareness with children about what is or is not acceptable behaviour and how and where to seek help if worried. Contact for this is through Emma Grishin NSPCC Area Child Line Coordinator email:- [EGrishin@NSPCC.org.uk](mailto:EGrishin@NSPCC.org.uk) or Tel: 0115 9258602.

## **Mobile Phones and Cameras in Early Years and Foundation Stage**

Appropriate use of mobile phones is essential at TBAC. The use of mobile phones must not detract from the quality of supervision and care of children. All parents have the mobile phone number that is used by the centre and are encouraged to text or phone on that number. Practitioners are able to use their personal mobile phones during their break times. During working hours they must be kept out of the reach of children and parents, in a secure area accessible only to staff. All staff are made aware of their duty to follow this procedure which is set out in the Code of Conduct.

Visitors to the setting (including/excluding parents) are requested not to bring their mobile phones onto the premises or to hand them in at reception for collection on departure.

Important contact details of the children are kept on the setting's mobile phone in case of an emergency.

We believe that photographs validate children's experiences and achievements and are a valuable way of recording milestones in a child's life. Parental permission for the different ways in which we use photographs is gained as part of the initial registration at [TBAC]. We take a mixture of photos that reflect the pre-school environment; sometimes this will be when children are engrossed in an activity either on their own or with their peers. Children are encouraged to use the camera to take photos of their peers. In order to safeguard children and adults, and to maintain privacy, cameras are not to be taken into the toilets by adults or children. All adults whether teachers/practitioners or volunteers at [TBAC] understand the difference between appropriate and inappropriate sharing of images. All images are kept securely in compliance with the Data Protection Act

## **Further guidance**

To support the work around child protection and safeguarding, links to statutory, national and local guidance are below:

- Child Sexual Exploitation 'What to do if you suspect a child is being sexually exploited'  
<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>
- Female Genital Mutilation (FGM)  
<http://media.education.gov.uk/assets/files/pdf/f/fgm%20guidance.pdf>
- Children who may have been trafficked  
<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>
- Gang and Knife Crime DCSF – 00064-2010  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288804/Safeguarding\\_children\\_Gang\\_activity.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/288804/Safeguarding_children_Gang_activity.pdf)
- Homophobic, Transphobic Bullying  
<https://www.gov.uk/government/news/homophobic-bullying-in-schools-project-gets-underway>
- Guidance is also available on the NCSCB Website for Children with Looked After Status and Children Missing from Home and Care
- Private fostering arrangements - [www.privatefostering.org.uk](http://www.privatefostering.org.uk)
- Sexting in Schools and Colleges  
[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/551575/6.2439\\_KG\\_NCA\\_Sexting\\_in\\_Schools\\_WEB\\_\\_1\\_.PDF](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB__1_.PDF)
- Further information and guidance around Disqualification by Association produced by Nottingham City Council's HR Advisory Service can be found here in the Downloads section: <http://www.nottinghamcity.gov.uk/esn/index.aspx?articleid=19323>
- Guidelines on supporting children with continence issues - <https://www.nice.org.uk/guidance/CG111/chapter/introduction>

### **Policy reviewed by :**

- o **Nigel Best** **Date: 01 May 2017**
- o **Errol Brown** **Date: 01 May 2017**