



The Safeguarding & Protection of Young People in Our Care Policy (R.E.A.L. Alternative Provision School)

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If at any point there is a risk of immediate serious harm to a child, or a genuine concern that appropriate action hasn't been taken, a referral should be made to



Children's Social Care and/or the police immediately. Anybody can make the referral.

Principles

Safeguarding is defined by the Children's Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2002) as meaning that:

- Agencies [and organisations] working with children and young people take all reasonable measures to ensure that the risks of harm to the individual's welfare are minimised.
- Where there are concerns about children and young people's welfare, all agencies [and organisations] take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies.

The basic principles on which this policy stands include:

1. The welfare of the young person is paramount
2. R.E.A.L. Alternative Provision School will work together with other relevant agencies
3. R.E.A.L. Alternative Provision School will be open with parents as long as this does not put the young person at risk
4. Confidentiality is important in all cases, but not at the expense of the welfare of the young person
5. R.E.A.L. Alternative Provision School accepts the duty of care to all young people with which it works and will ensure that the activities it runs and the environment it works in are safe
6. R.E.A.L. Alternative Provision School recognise the existence of unidentified abused children and that some of these may present in activities organised by R.E.A.L.
7. Each staff member, volunteer or staff contracted from outside agencies is responsible for ensuring that the policy is translated into action through his or her daily practice.

R.E.A.L. Alternative Provision School and its partners will ensure that all staff and volunteers interacting with young people are aware of their responsibilities for safeguarding the welfare of the young people. This will be done through providing training and support in helping them understand the needs of the young people with whom we work, as well as ensuring they understand their individual and organisational responsibilities when working with young people.



R.E.A.L. Alternative Provision School will facilitate regular updating of training for all staff engaged in delivering its services. It is the responsibility of all members of staff to ensure that their working knowledge is updated at this training. The starting point for this training will be within the induction programme for all new staff engaged in the activities of R.E.A.L.

Commitment to Procedures

R.E.A.L. Alternative Provision School is committed to the principles which have been outlined and will implement them through the guidelines laid out in this policy. Each staff member is responsible for ensuring that the policy is translated into action through his or her daily practice.

Legal Basis of R.E.A.L Alternative Provision School's Role

The role of R.E.A.L. Alternative Provision School is not to investigate these matters. As issues arise, R.E.A.L. Alternative Provision School's role will be to record events. All concerns should be referred immediately back to the R.E.A.L Alternative Provision School's Designated Safeguarding Lead. From there, information will be passed on to either the Children's Social Care, or the Police. At times of high workload and to ensure quality standards are upheld, other members from the R.E.A.L leadership team, who are DSL trained, may be utilised as the lead DSL to complete work on behalf of R.E.A.L Alternative Provision School.

The Role of the R.E.A.L Leadership Team (FLT) and the link to R.E.A.L. Alternative Provision School

It is the role of the Executive Leadership Team to disseminate of information and 'lessons learnt' from either company practice, local serious case reviews (through the local Children's Safeguarding Partnership), or national legislation and guidance. The R.E.A.L Leadership Team, through the DSL Forum, will have an overview of all safeguarding incidents within R.E.A.L. to enable staff training to be targeted and meaningful.

The role of the Designated Safeguarding Officer and the other qualified Designated Safeguarding Leads

It is the role of the Designated Safeguarding Leads (DSL) and/or one of he other Safeguarding Leads to follow up all potential safeguarding issues and make referrals to other agencies when



appropriate. During term time one of the DSL Team will always be available (during teaching hours) for staff to discuss any safeguarding concerns. At least one member of the Designated Safeguarding Lead team will be available to contact during any school led out of hours or out of term activities.

All Designated Safeguarding Leads will be trained to the same standards and complete refresher training at least every 2 years. They will also take part in internal Safeguarding forum meetings and LA organised events in order to keep up-to-date with issues and serious case reviews etc.

Roles and Responsibilities of the Designated Safeguarding Governor

The Safeguarding Governor supports the work of the safeguarding lead and reports back to the governing body how effective safeguarding is in the school. The safeguarding governor monitors the schools safeguarding procedures on a regular basis and supports the completion of any local authority safeguarding audits received. Should the safeguarding governor for our school be unavailable for any reason, R.E.A.L Alternative Provision School will recruit the safeguarding governor from R.E.A.L. Independent School as a temporary measure.

Roles and Responsibilities of the Chair of Governors

The Chair of Governors has the responsibility to ensure that the school complies with safeguarding duties under legislation and will take leadership responsibility for the school's safeguarding arrangements. Safeguarding is a standing item at all monitoring meetings. The Chair of Governors will:

- Liaise with the Local Authority Designated Officer (LADO) (also known as Designated Officer) and partner agencies in the event of any allegations of abuse made against the Headteacher.
- There are procedures in place to handle allegations of abuse against staff and volunteers and that such allegations are referred to the Local Authority Designated Officer (LADO)/Designated Officer at the local authority and that procedures are in place to make a referral to the Disclosure and Barring Service (DBS) when the criteria has been met. There are also procedures in place to handle allegations of abuse by children against other children also known as 'peer on peer abuse'.



Safer Recruitment

R.E.A.L. Alternative Provision School ensures safe recruitment by undertaking the following procedures;

- All those involved in recruitment have completed safer recruitment training.
- Qualification checks.
- Enhanced DBS checks.
- National Insurance and photo ID information.
- Reference checks.
- For qualified teachers only, teachers will be subject to a prohibition check of the teacher reference number.
- Debarred by association

All registered Governors and Proprietors, members of the School Leadership Team, Curriculum Leads and teaching staff of the R.E.A.L. Alternative Provision School will be subject to an enhanced DBS check, including a section 128 and added to the single central register.

An accompanying policy outlines our safer recruitment commitments in full detail, including all procedures and practice for safer recruitment.

Records of Issues and Incidents

The young person at the centre of any safeguarding issue has a need for confidentiality. Therefore, R.E.A.L. Alternative Provision School has a need for security to ensure this confidentiality. However, this is not absolute confidentiality, and all records should be available for inspection by any investigating body.

All safeguarding incidents will be recorded using an agreed format and will be stored securely in a separate electronic safeguarding file. However, where concerns are raised and recorded but do not meet thresholds for referrals to relevant agencies, information will be stored on the pupils' central file.

Sharing of Information with R.E.A.L. Alternative Provision School

No one will make decisions within the R.E.A.L. Alternative Provision School about safeguarding issues on their own. The only decision to make is whether to refer the matter on to an



investigating body. This decision will normally be made through discussion between the staff member with concerns and the Designated Safeguarding Lead.

Relationships with Parents

R.E.A.L. Alternative Provision School wishes to preserve its good relationships with the parents of the young people associated with it, both as service users and volunteers. However, the first principle on which R.E.A.L. Alternative Provision School's work is based is that the welfare of the young person is paramount. Consequently, R.E.A.L. Alternative Provision School will consult and confer with parents of the young person involved in Safeguarding issues openly and honestly, except in circumstances where the young person's welfare may be harmed by doing so.

Emergency Contacts

R.E.A.L. Alternative Provision School will ensure that it has at least two different emergency contacts for every learner on the school roll and those working in REAL Education. These will be used in case of emergency or in case there are welfare issues at home.

Maintaining High Standards

R.E.A.L. Alternative Provision School places people in positions of responsibility for young people. Consequently, R.E.A.L. Alternative Provision School seeks to do all that is reasonable to ensure the good character of all employed in delivering its services, including volunteers, and the safety of young people. Therefore recruitment and induction procedures are necessarily robust and all staff and key volunteers undertake an enhanced DBS check. R.E.A.L. Alternative Provision School recognises however that these checks are not a guarantee that the checked person's behaviour will always continue to be appropriate. All staff are responsible for maintaining high standards of behaviour when engaged in R.E.A.L. Alternative Provision School's provision and are encouraged to raise their own concerns of others' inappropriate behaviour with any of the Designated Safeguarding Lead. All staff will wear photographic identification whilst engaged in the work of R.E.A.L. and this will include details of their DBS certificate should it be requested by external parties. We maintain a single central register with all necessary details which is updated, monitored and reviewed.



Reporting of Attendance

Any non-attendance will be reported within half an hour of the start of a session. R.E.A.L. Alternative Provision School support 'first day response' calls where required. The appropriate Learning Manager, or Learner Engagement and Attendance Lead has access to real time attendance reporting software and will pass on any attendance concerns to a Designated Safeguarding Lead.

Learners Absconding from Education

If a learner is suspected of leaving a R.E.A.L Alternative Provision School Learning Hub, or community venue without permission:

- The member of staff will alert the relevant Learning Manager. If the Learning Manager is not available then the central office they are able to inform the relevant Designated Safeguarding Lead.
- If the child appears to be missing but there is no evidence that he / she has left the site, a quick but thorough search of the site should then be conducted. If at a community venue, inform the relevant manager to ensure all areas have been checked.
- If there is no doubt that the pupil has absconded, the Learning Manager, or DSL will contact the pupil's parent/carer/care home to inform them. If parents/carers have the learner mobile they will attempt to contact them to find out where they are. If this is not successful a decision will be made about phoning the police. It is the responsibility of the last person who saw the learner to phone the police. The DSL, or Learning Manager will give the staff member advice and support with this if required.
- Other professionals may be involved in the care of the pupil (such as Children's Social Care, or Residential Social Care staff), and they too should be informed of the incident at the earliest possible point.
- Staff to follow the pupil (if safe to do so, or they are in sight) at a safe distance and to keep the Learning Manager informed. Where possible, the member of staff following the student should remain in contact with the Learning Manager, or DSL, via a mobile phone. The Learning Manager, or DSL, will then, if appropriate, allocate further staff members to go and collect the learner and return them to a safe and agreed location. Staff should not run after the learner as this can cause anxiety levels for the learner to rise and may result in a more dangerous



situation.

- If relevant and with authorisation from the Learning Manager or DSL, staff to support further searches of known places the learner would visit.

- It is important that following an incident the issues that arise are addressed and the Learning Manager should:

- Review the incident with the learner, parents/carers and other professionals where relevant. Record and identify hazards and controls required to keep the learner safe within their individual risk assessment.
- Complete a significant incident form (a copy of which should be placed in the learner's central electronic file)
- Keep all colleagues informed of any changes to the risk assessment and discuss the incident in curriculum planning meetings and/or in support and supervision

Alternative Provisions

R.E.A.L Alternative Provision School understands the importance of ensuring that learners who access alternative provision are safeguarded as well as they are when attending school led provisions. We will ensure that we obtain a written statement from each of our providers that states that they have completed all the necessary vetting and barring checks on their staff. In addition to this, R.E.A.L Alternative Provision School will ensure it completes at least annual compliance check to ensure visits to all alternative providers to ensure they meet our high standards of safeguarding and comply with safeguarding legislation.

Safeguarding of young people with SEND

A very high percentage of learners admitted to the roll of R.E.A.L Alternative Provision School have an EHCP or some form of Special Educational Need and Disability. It is recognised that additional barriers can exist with this group of learners when recognising abuse and neglect. These barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted



by behaviours such as bullying, without outwardly showing any signs; and

- communication barriers and difficulties in overcoming these barriers

R.E.A.L Alternative Provision School recognises these potential barriers and takes them into account when dealing with potential Safeguarding issues. Our knowledge of the learner's individual needs, and our relationships with learners, are paramount to any issue we deal with and inform our practice at all times.

Use of reasonable force

R.E.A.L Alternative Provision School operates a practice of de-escalation rather than use of reasonable force when dealing with the behaviour of learners. Wherever possible, use of reasonable force is avoided and is only used as a last resort if it:

- a) Prevents someone from committing a criminal offence
- b) Prevents personal injury or property damage of the young person, staff member or member of the public
- c) Prejudices the maintenance of good order and discipline at the school.

(Please refer to the Policy for the [Management of behaviour](#) for further details)

Support for Staff and Volunteers Involved in Safeguarding Issues

R.E.A.L. Alternative Provision School recognises that safeguarding issues are likely to be stressful for all staff involved and will seek to provide a reasonable and appropriate level of support. If any members of staff are cited in any way as part of an incident they will be removed from the situation immediately.

If any members of staff have concerns about anything that could be a safeguarding issue, they will talk to their line manager, or anyone who is responsible for managing the education program of the young person. All concerns will be recorded using the agreed school format.

Training for Staff and Governors

All staff and volunteers have a probationary period (this is not applicable to Governors) in which they will receive training and guidance, support and supervision. It will be the responsibility of



the management to ensure that staff and volunteers successfully complete their probationary period. If there is any doubt as to the ability of the volunteer or staff member, a further probationary period may be applied or other measures taken.

Training will be given on:

- The duty of care - including the duty to report any abuse discovered or suspected.
- Training on what constitutes abuse and how to recognise it.
- The procedural approach of how and to whom to report abuse if discovered or suspected.
- Contact information for appropriate persons, whom staff and volunteers can approach if they know or suspect that an abuser may be a member of R.E.A.L.
- Knowledge and understanding of what happens when abuse is reported.
- Guidance on supporting distressed young people.
- Prevent Strategies
- Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM) and all other national guidance as cited in 'Keeping Children Safe in Education', Part One.
- E-safety including sexting

Training for Volunteers

All volunteers, including those on work experience placements, will be subject to an enhanced DBS check, and will be entered onto the single central record. All volunteers will be given a single point of contact to discuss all safeguarding concerns and be given instruction with regards to the safeguarding procedures and practice within R.E.A.L Alternative Provision School. All volunteers will have access to further training through the CPD menu, and access to the R.E.A.L Alternative Provision School induction process (if practical).

Supervision of Young People

The young people at R.E.A.L. Alternative Provision School's care will be properly supervised at all times and R.E.A.L. Alternative Provision School will ensure that there is an appropriate level of male and female staff cover if working with a mixed gender group. R.E.A.L Alternative Provision School considers the lack of supervision of young people a serious conduct issue, and will follow the relevant disciplinary procedures where required. This is also referred to within the



[REAL Staff Code of Conduct.](#)

Visitor Policy

R.E.A.L Alternative Provision School operate from a variety of sites across a variety of locations. Some sites are within the community and are accessed by members of the public. R.E.A.L. staff will wear their identification badges at all times.

Any visitors to a R.E.A.L Education hub will report to reception or the duty manager on site in all cases. They will state the purpose for their visit, who they have been invited by, and will be required to sign in. Visitors will not be left unsupervised at any time whilst on site, and will be required to wear their identification badge. R.E.A.L Education staff members will challenge any unknown adult, without identification, without exception.

When parents visit the young person's Learning Manager will accompany them at all times and introduce them to members of staff so they are identified and the purpose of their visit stated. This is to ensure a warm and welcoming visit.

Dealing with disclosure

This is a quick reference guide to working with young people under the Safeguarding Principles

1. An open and honest disclosure of abuse by a young person to a member of staff is an indication of the high level of esteem and trust that the young person has for the member of staff. Staff should reciprocate that respect by supporting the young person appropriately
2. Any allegation of any form of abuse by a young person must be taken seriously. This can also include any allegations made by a learner against another learner
3. As soon as you have a Safeguarding concern:
 - Do not question the young person - just listen.
 - Do not promise confidentiality; explain your responsibilities.
 - Do not use leading questions.
 - Do not stop a young person who is freely recalling significant events.
 - Do not ask the young person to repeat their story to a colleague.



- Do not ask the young person to write their story down.
- Do not conduct your own investigation into any incident .
- Do not make statements to any media or any member of the public.
- Keep control; the young person will be depending on you.
- Keep an open mind.
- Respond to the young person's emotional state appropriately.
- Beware of your own interpretation of what you hear.
- If the child is in immediate danger all staff MUST take emergency action
- Contact the Learning Manager / Provision Manager who will then contact Designated Safeguarding Lead to discuss the disclosure and take further advice.
- As soon as possible record the information on a [safeguarding concern form](#) including times and those in attendance, as well as what was said.
- Support the young person's feelings and manage your own, or seek support if you require it.
- All external enquiries (from media or public) must be directed towards the Designated Safeguarding Lead, who will in turn seek advice from the R.E.A.L Leadership Team.

As an organisation we fully understand the trauma involved in dealing with disclosure. Discuss any personal needs initially with the Learning Manager / your Line Manager or a Designated Safeguarding Lead and make any arrangements for further support you may have. Do not feel isolated in these matters.

Guidance information for allegations made against a member of staff or volunteer

R.E.A.L Education takes seriously the poor practice of any member of staff, or other professional very seriously. All staff must remember that the welfare of the child is paramount. All concerns about a child's welfare brought about by the behaviour of colleagues should be reported.

There are strict local authority procedures around the management of allegations made against



a member of staff, Governor or volunteer working for an organisation. So that allegations made against a member of staff are dealt with objectively and without prejudice, the local authority enforces that any allegation against a member of staff within an organisation must then be discussed with the Local Authority Designated Officer (LADO). Following any formal referral to the LADO a decision will be taken in collaboration with them to inform Ofsted.

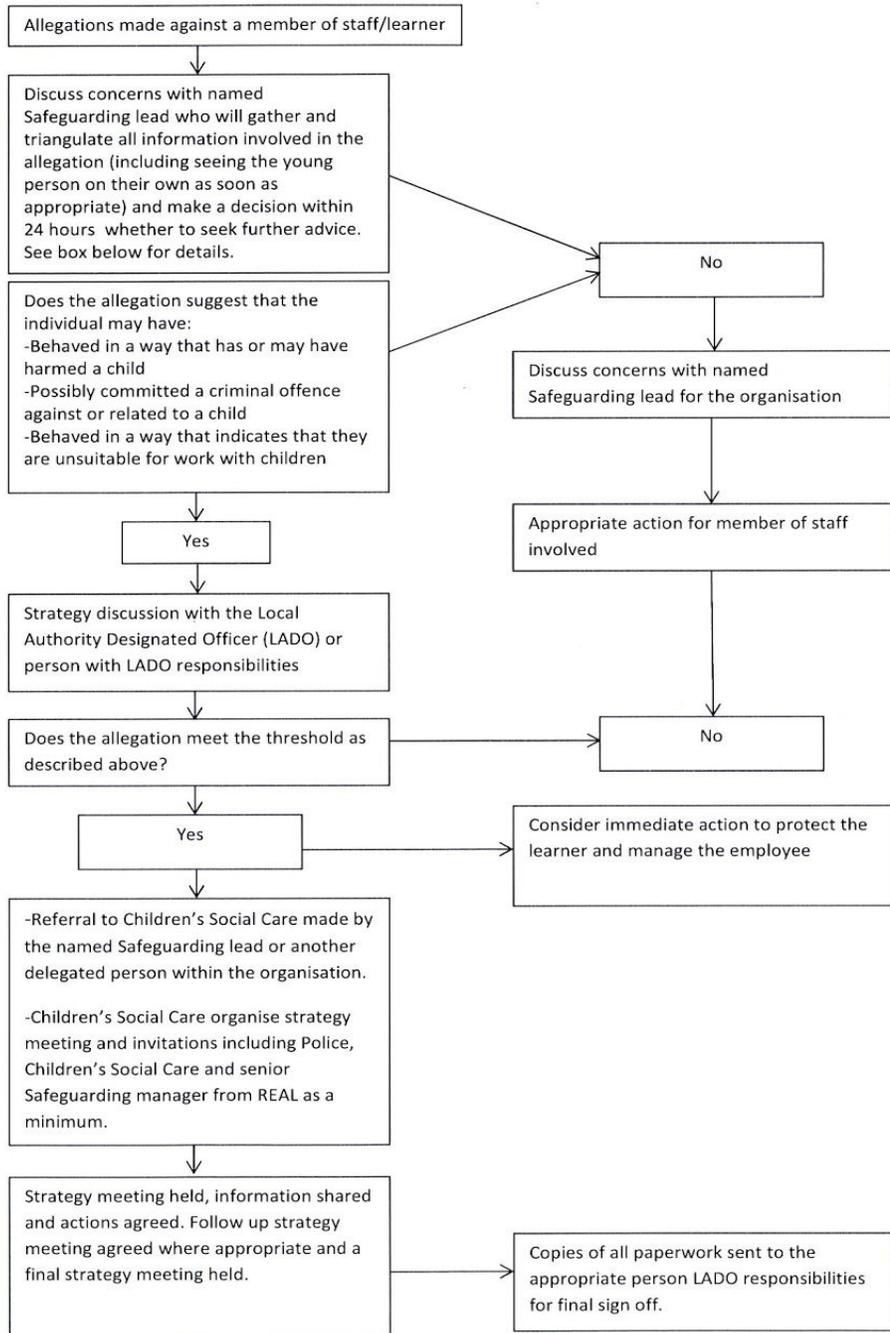
Allegations made Against the Headteacher, Senior Managers or Governors

At R.E.A.L anyone can raise a concern or allegation against any member of staff regardless of their seniority or position within the organisation. If this is the Headteacher then this can be discussed with the Chair of Governors.

Allegations against Proprietors

The proprietors of R.E.A.L Alternative Provision School are the R.E.A.L Foundation Trust. Our Designated Safeguarding lead and Deputy leads are all 'suitable people' who are sufficiently independent from the members of The Foundation Trust. This means that, in the event of a member of the Foundation Trust or one of the Directors of REAL having an allegation made against them, the DSL and deputy DSL are sufficiently qualified and independent to investigate fully, with support from the LADO if necessary.

Managing an allegation made against a member of staff / another learner





Guidance information for staff and volunteers

Categories of young person abuse—definitions to support your work

It is accepted that any definition has its limitations in terms of accuracy and relevance. Bearing this in mind, the following definitions are offered to help our understanding.

Neglect

Neglect is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the young person's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect the young person from physical harm or danger, or the failure to ensure access to appropriate medical aid or treatment. It may also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a young person. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a young person whom they are looking after. This is commonly described using terms such as induced/fabricated illness by carer or Munchausen's Syndrome by Proxy or more recently "facilitated illness".

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the young person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non contact activities such as involving a young person looking at, or in the production of pornographic material, or watching sexual activities, or encouraging a young person to behave in sexually inappropriate ways.

Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a young person such as to cause severe and persistent adverse effects on the young person's emotional development. It may involve conveying to a young person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on a young person. It may involve causing a young person frequently to feel frightened or in danger, or the exploitation or corruption of a young



person. Some level of emotional abuse is involved in all types of ill treatment of a young person, though it may occur alone.

Contextual Safeguarding

R.E.A.L Alternative Provision School operates over a wide area of the East Midlands. We understand the importance of keeping up-to-date with safeguarding issues experienced within each of the localities we work in. When assessing the needs of our learners, we take into account their social circle out of school and the potential issues they face after hours. Where they live in areas of high concern, we liaise closely with parents/carers and try to ensure that our PSHE curriculum targets these issues. In addition, we liaise closely with other agencies when we are concerned about out of hours activities.

Peer on Peer abuse

R.E.A.L Alternative Provision School understands that peer-on-peer abuse can be a spectrum of concerns from bullying to serious violence. Peer on peer abuse is discussed in the staff induction and during our safeguarding up-date training.

Our policy for the management of behaviour includes information on how R.E.A.L Alternative Provision School view particular concerns, and the thresholds to involve further agencies (high level response/consequences). We understand this type of abuse should always be treated seriously, whether as a safeguarding matter, or something more serious where the involvement of the police is required.

What is peer on peer abuse?

All staff at R.E.A.L Alternative Provision School are aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm



- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals.

Peer on peer abuse can affect any child or young person, and sometimes vulnerable children can be targeted, those at particular risk may include:

- Those living with domestic abuse or intra-familial abuse in their histories
- Young people in care
- Those who have experienced bereavement through the loss of a parent, sibling or friend
- Black and minority ethnic children are under identified as victims but are over identified as perpetrators
- Both girls and boys experience peer on peer abuse however they are likely to experience it differently i.e. girls being sexually touched/assaulted or boys being subject to homophobic taunts/initiation/hazing type (rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group) violence.

Peer on peer abuse can also be influenced by the nature of the environments in which children/young people spend their time - home, school/college, peer group and community - and is built upon notions of power and consent. Power imbalances related to gender, social status within a group, intellectual ability, economic wealth, and social marginalisation can all be used to exert power over a peer.

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.

Child Criminal Exploitation (County Lines)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. R.E.A.L Alternative Provision School realises that the key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism⁹⁵ will be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;

Female Genital Mutilation (FGM)

The World Health Organisation defines FGM as “all procedures (not operations) which involve



partial or total removal of the external female genitalia or injury to the female genital organs whether for cultural or other non-therapeutic reasons” (1996).

It is illegal in the UK to subject a child to FGM or to take a child abroad to undergo FGM. A child for whom FGM is planned is at risk of significant harm through physical abuse and emotional abuse, which is categorised by some also as sexual abuse. Despite the harm it causes, many women from FGM practising communities consider FGM normal to protect their cultural identity. Although FGM is practiced by secular communities it is most often claimed to be carried out in accordance with religious beliefs. However, neither the Bible nor the Koran supports the practice of FGM. In addition to giving religious reasons for subjecting girls to FGM adults may say that they are acting in a child's best interests because it: - Brings status and respect to the girl. - Preserves a girl's virginity / chastity. - Is a right of passage. - Gives a girl social acceptance especially for marriage. - Upholds the family honour. - Helps girls and women to be clean and hygienic.

The age at which girls are subjected to FGM varies greatly, from shortly after birth to any time up to adulthood. The average age is 10-12 years. Health implications can range from severe pain and emotional/psychological trauma to, in some cases, death.

Therefore, it is our duty as an educational provider to ensure that:

- Staff and managers have an awareness of FGM and understand the signs indicating that a girl has undergone FGM or is at risk of this practice.
- Follow Local Authority procedures when a girl is at risk of or is suspected to have undergone FGM. These procedures include a referral to the relevant local authority social care (following local procedures) and reporting to the police when known cases have occurred with girls under the age of 18.

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. Compliance will be monitored through various inspection regimes such as Ofsted.

Our practice in this area is taken from the revised Prevent Duty Guidance. As an education provider, we are expected to:



- assess the risk of children being drawn into terrorism and have clear procedures in place for protecting children at risk of radicalisation.
- Work in partnership with our commissioning local authority by ensuring our safeguarding arrangements take into account the policies and procedures of the relevant local authority Safeguarding Children's Board
- Work in partnership with parents/carers by ensuring effective engagement with them when concerns are raised about their children.
- Ensure staff are trained to identify children at risk of being drawn into terrorism and challenge extreme ideas.
- Ensure that children are safe from terrorist and extremist material when accessing the internet in schools.
- Understand when it is appropriate to make a referral to the Channel Programme, the panel that reviews and refers individuals to programmes that challenge extremist ideology

Youth Produced Sexual Imagery

Youth produced sexual imagery is the definition R.E.A.L Alternative Provision School use for the activities usually known as sexting. These activities are those covered by the *'the sending or posting of sexually suggestive images, including nude or semi nude photographs via mobiles or via the internet'*

Imagery and images cover photographs and moving images, sent by young people, images they, or another young person may have created.

The law states that the making, possessing and and distributing any imagery of someone under 18 which is indecent is illegal, and this includes imagery of yourself.

However, R.E.A.L Alternative Provision School do not want to criminalise young people, and certain incidents can be treated as a safeguarding issue but only in very specific circumstances.

An immediate referral to the police and/or Children's' Social Care will be made if:

1. The incident involves an adult
2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or concerns about their capacity to give informed consent
3. What you know about the imagery suggests the content depicts sexual acts which are



- unusual for the young person's developmental and/or cognitive age
4. The imagery involves sexual acts and any young person under the age of 13
 5. There is reason to believe a learner is at immediate risk of harm owing to the sharing of the imagery e.g presents as suicidal, or is self-harming

Where a referral is not made, the following risks will be considered when treating the incident as a safeguarding concern, and, dependent on the outcome, a referral may still be made:

1. Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
2. Who has shared the imagery? Where has the imagery been shared? Was it shared/received with the knowledge of the pupil in the imagery?
3. Are there any adults involved in the sharing of the imagery?
4. What was the impact on the pupils involved?
5. Do the pupils involved have additional vulnerabilities?
6. Does the young person understand consent?
7. Has the young person taken part in this kind of activity before?

The youth produced imagery should not be viewed by adults, unless:

- Is the only way to make a decision about whether to involve other agencies
- Is necessary to report the image to the web site, app or suitable reporting agency to have it removed or to support the young person in making a report
- It is unavoidable because the young person has presented the image, or it has been found on the school network.

If the imagery is to be viewed these points will be followed:

Do's

- ✓ Discuss the decision with the headteacher
- ✓ Ensure that the viewing takes place with another member of the safeguarding team
- ✓ Ensure viewing takes place on the school premises
- ✓ Ensure viewing is done by a member of the same sex
- ✓ Record the viewing of the imagery in the schools safeguarding records

Don'ts

- x Never print, copy or share the imagery
- x View unnecessarily
- x Put the child at further risk
- x Allow other people than the DSL to view the imagery



All decisions taken will be recorded in a running log, and any viewing of imagery for the reasons above will be recorded as a safeguarding, and e-safety incident and will follow the procedures for the reporting of such incidents.

Managing Incidents of Self Harm

Introduction

It is widely recognised that self-harm among children and young people is a major concern, with some evidence that the rates are higher in the United Kingdom than the rest of Europe. Self-harm is often an indicator of emotional distress and can be a sign of mental health problems.

Purpose

The purpose of this guidance, which sits within the R.E.A.L Alternative Provision School Safeguarding Policy, is to provide additional support for staff working with children and young people who are either self-harming or at risk of self-harm or suicide. Real Education aims to provide a non judgemental, consistent and caring response to all incidents. Our aim is to support staff to feel confident and informed in order to appropriately support children and young people. Staff should know who to consult with and possible referral pathways.

What is self harm

Self-harm is where someone does something to deliberately hurt him or herself. This non exhaustive list may include behaviours such as cutting, scratching, tying something around body, inserting things into the body, hitting or punching self, pulling out hair, over/under eating, burning or scalding themselves, hitting head, self strangulation, taking non prescription drugs, overdosing or self poisoning.

Signs and Symptoms

Signs and symptoms are sometimes absent or easy to miss. It is not uncommon for individuals who self-harm to offer stories which seem implausible or which may explain one, but not all, physical signs. If a pupil says they are not self-harming or evades the question, you can keep the door open by reminding them that you are always available to talk about anything, should they so wish. Try to stay connected to the pupil and look for other opportunities to ask, particularly if there are continuing signs that your suspicion is correct.



Guidance for managing incidents of self harm

- Do find out about potential triggers and what to look for where there is a history of self harm.
- Do remain calm and find somewhere private to talk.
- Don't promise absolute confidentiality.
- Do provide or seek medical first aid if necessary.
- Do think about managing contagion and keeping the environment safe for other vulnerable children and young people.
- Do check the individual risk assessment and care plan if available to ensure that identified controls can be put in place.
- Do speak to the child's Learning Manager and/ or DSL to assess risk, and think about protective factors. This will include a discussion around intent for each individual incident.

Pathway planning:

High Level Risk Incident - seek medical / police assistance if there is an immediate risk to life; contact crisis team and share information with parents/carers.

Medium Level Risk Incident - think about what support / protective factors are already in place. Encourage and empower self management. Consider referral to in house counselling or CAMHS. Alternatively, make a referral to Early Help or The Healthy Families Service with the learner consent.

Low Level Risk Incident - Do some work with learner to build resilience and self esteem. Consider alternative strategies for managing self harm and alternative coping strategies.

Recording of Incidents



Do record every incident, in a timely manner, on Safeguarding concern log and or Significant Incident Report.

Seeking Support

R.E.A.L Education are committed to ensuring the welfare of staff to ensure that they are able to effectively manage the needs of complex children and young people. Please do look after yourself and access support from your Line Manager or Designated Safeguarding Leads. Please keep up to date by attending staff briefings and training around self harm and suicide prevention.

For more information and advice on self harm and suicide prevention: www.harmless.org.uk
www.youngminds.org.uk

Serious Violence and Serious Sexual Offences

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

Advice for schools and colleges is provided in the Home Office's preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults (county lines guidance).

Upskirting

Upskirting is a criminal offence, and should be reported immediately to the police. Upskirting is the practice of photographing underneath a person's dress or skirt, without their knowledge or consent. This can include taking imagery whilst the perpetrator is not present e.g. using a remote video camera

Student Safeguarding Statement to Learners

The safety of all children and young people is paramount and all staff will listen to every concern



and disclosure with sensitivity and respect and take what is said seriously.

R.E.A.L. Alternative Provision School needs to make sure that it does “the right thing” for learners who disclose abuse, so if what is said to any R.E.A.L Alternative Provision School staff member makes them concerned then they will need to discuss your concern or disclosure so that decisions can be made about what to do next. You will be fully informed about any decisions that are made.

Children’s Social Care or the Police may then start their investigation and they may want to talk to you or other people involved. In these matters, your safety is paramount, so you can be sure that they will only do what is right and proper.

If any member of staff believe you are in immediate danger they will contact the relevant emergency service (e.g. Police, Ambulance) so help can be sought straight away.

Student Safeguarding Statement to Parents/Carers

The safety of all children and young people is paramount and all staff will listen to every concern and disclosure with sensitivity and respect and take what is said seriously.

R.E.A.L. Alternative Provision School needs to make sure that it does ‘the right thing’ for learners who disclose abuse, so if what is said to any R.E.A.L Alternative Provision School staff member makes them concerned then they will need to discuss the learners concern or disclosure so that decisions can be made about what to do next. The learner will be fully informed about any decisions that are made.

Children’s Social Care and the Police may start an investigation and they may want to talk to you or other people involved. In these matters, the safety of all children and young people is paramount, so parents / carers can be sure that they will only do what is right and proper.

If any member of staff thinks that a learner is in immediate danger, emergency help (e.g. Police, Ambulance) will be sought straight away.

Student Safeguarding Statement to Commissioners

The safety of all children and young people is paramount and all staff will listen to every concern and disclosure with sensitivity and respect and take what is said seriously. All learners will be taught to keep themselves safe using a cross curricular approach throughout each academic year.

R.E.A.L. Alternative Provision School needs to make sure that it does ‘the right thing’ for



learners who disclose abuse, so if what is said to any R.E.A.L. Alternative Provision School staff member makes them concerned then they will need to discuss the learner's concern or disclosure so that decisions can be made about what to do next. The learner will be fully informed about any decisions that are made.

Commissioners will be kept fully informed and all concerns will be properly recorded and stored and all information will be shared appropriately.

Children's Social Care and the Police may start an investigation and they may want to talk to commissioners or other people involved. In these matters, the safety of all children and young people is paramount, so commissioners can be sure that they will only do what is right and proper.

If any member of staff thinks that a learner is in immediate danger, emergency help (e.g. Police, Ambulance) will be sought straight away.

Implementation of the policy: Review and Quality Assurance

The leadership team and governors are responsible for ensuring that this policy is displayed on the school's website and that it is overseen to ensure it is implemented fully. They review its content on an annual basis, or sooner if legislation requires.. The Head Teacher reports on Safeguarding activity and progress within the School to the Governing Body. The Head teacher also completes any Local Authority Safeguarding Audits received and these are used to report on Safeguarding activity, progress and developments. A copy of the audits are submitted to the CPM for Schools / Education settings at the appropriate local authority. The designated safeguarding governor reviews the effectiveness of safeguarding arrangements on a termly basis and provides detailed reports for the full governing body. These reports also contain recommendations for further development if necessary.

Child Protection Procedures

All learners at some point may require additional support to keep them safe in the interest of their own welfare. However all practitioners have a responsibility to refer a child to children's social care under section 11 of the Children Act 2004 if they believe or suspect that the child:

- Has suffered significant harm;
- Is likely to suffer significant harm;



- Has a disability, developmental and welfare needs which are likely only to be met through provision of family support services (with agreement of the child's parent) under the Children Act 1989;
- Is a Child in Need whose development would be likely to be impaired without provision of services.

Child protection procedures are assessed and managed through Children's Social Care, and may also include some elements of early help services.

All child protection procedures incorporate specific steps, with specific criteria and thresholds. These thresholds govern the level of service required by the young person and their families/carers to keep them safe. The table below gives a brief overview of these steps and what they mean.

Early Help Assessments & access to services	Early help assessments are made with children and their families to identify additional support and interventions to meet their needs. Early help services work alongside universal services to target support where it is needed.
Section 17 Assessment & child in need	Following acceptance of a referral by the local authority children's social care, a social worker should lead a multi-agency assessment under section 17 of the Children Act 1989. Local authorities have a duty to ascertain the child's wishes and feelings and take account of them when planning the provision of their services.
Section 47 Enquiries & child suffering significant harm	Under Section 47 of the Children Act 1989, if a child is taken into Police Protection, is the subject of an Emergency Protection Order or there are reasonable grounds to suspect that a child is suffering or is likely to suffer Significant Harm, a Section 47 enquiry is initiated. The aim is to decide whether any action should be taken to safeguard the child. This enquiry often informs other child protection proceedings.
Section 20 Child in need of accommodation	Section 20 places a duty on a local authority to provide accommodation for children who do not have somewhere suitable to live. It is sometimes called 'voluntary care' or 'voluntary accommodation' because usually parents must agree to the child being accommodated.



Section 31 Care orders	Section 31 of the Children Act 1989 – Care Order. The family court can create a care order under Section 31(1) (a) of the Children Act, placing a child in the care of a designated local authority, with parental responsibility being shared between the parents and the local authority.
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In the case of all of the levels of services outlined above, a qualified social worker will make decisions as to which pathway is suitable, through a robust referral and assessment procedure.

Referral to Children’s Social Care

Where it is believed that a child has complex/serious needs or where there are child protection concerns, the Designated Safeguarding Lead (DSL) will make a referral to Children’s Social Care

Anyone can make a referral directly to Children’s Social Care (using the details below), or the police, if they suspect a child is suffering significant harm and not in immediate danger (call 101), or in immediate danger, or an emergency (999).

Access to child protection services are local to the area in which the child, or family reside. Contact details are below, click on the link to access further information on how to report a concern about a child.

Alternatively, for further support and advice contact a designated safeguarding lead without delay to discuss your concerns. You may be asked to complete a [safeguarding concern form](#) with further details, this form may be used to make a direct referral to Social Care so be sure to include as much information about the incident/disclosure/concern as you can.

The links to the local safeguarding board can be used to view further information and details on the specific referral pathways, how to access early help services, and the specific thresholds for services in each area.

Area	Child Protection	Local Safeguarding Board
Nottingham City	Children and Families Direct	http://www.nottinghamshire.gov.uk/nscb



Nottinghamshire	<u>MASH</u>	https://www.nottinghamcity.gov.uk/children-and-families/nottingham-city-safeguarding-children-board/
Leicester City	<u>Childrens Social Care Referrals</u>	http://www.lcitylscb.org/
Leicestershire	<u>First Response</u>	http://lrsb.org.uk/
Derby City	<u>Derby Childrens Social Care</u>	https://www.derbylscb.org.uk/
Derbyshire	<u>Starting Point</u>	https://www.derbyshirescb.org.uk/home.aspx
Rotherham	<u>Report Child Abuse</u>	http://www.rscb.org.uk/
Lincolnshire	<u>Childrens Services Customer Service Centre</u>	https://www.lincolnshire.gov.uk/
Doncaster	<u>Doncaster Children's Social Care: child at risk report</u>	https://dscp.org.uk/

Please Note:

This policy links directly to other relevant policies:

- Whistleblowing
- Preventing and Tackling Bullying
- Recruitment: policy, procedure and practice
- Policy for the management of behaviour
- E-safety (includes details on the monitoring and reporting of breaches in internet safety)
- Prevent Policy
- Equality Opportunities and Diversity Policy
- The General Data Protection Regulations Policy

This policy should also be read with the Practice Guidance :



Keeping Children Safe in Education - 2019

Working Together to Safeguard Children - 2018

The Prevent Duty - 2015

Female Genital Mutilation National Guidance - 2015

DfE School Attendance - 2015

DfE Children Missing Education - 2015

DfE Children Missing from Home and Care - 2015

DfE Promoting Fundamental British Values as part of SMSC in Schools - 2014

This policy should be used in conjunction with local authority guidance, web links shown in the table shown previously in the Child Protection section and below

This policy should be used in conjunction with the following local authority guidance:

Nottinghamshire County Council:

<http://www.nottinghamshire.gov.uk/caring/protecting-and-safeguarding/nscb/informationprofessionals/procedures-practice-guidance/>

www.nottscc.gov.uk/nscb

Nottingham City Council:

<http://www.nottinghamcity.gov.uk/article/23729/Safeguarding-Children-Procedures-and-Practice-Guidance-Documents>

www.nottinghamcity.gov.uk/nscb

Derbyshire County Council:

http://www.derbyshirescb.org.uk/home_docs.html



Derby City Council:

<http://www.derby.gov.uk/health-and-social-care/safeguarding-children/>

Leicestershire County Council:

<http://www.leics.gov.uk/safeguarding>

Leicester City Council

<http://www.lcitylscb.org/>

Rotherham Metropolitan Council

<http://www.rotherham.gov.uk/safeguarding/>

This policy will be reviewed on an annual basis by the forum of R.E.A.L Designated Safeguarding Leads and ratified by the board of Directors.

It will be reviewed in line with any lessons learnt through safeguarding audits including termly 'learning walks'. This process informs the quality assurance of this policy.

Revision history:

17/09/19 Addition of newly qualified DSLs

18/07/19 Full review of the policy in light of the Keeping Children Safe in Education 2019 guidance and Ofsted recommendations from the 17/06/19

27/03/19 Addition of newly qualified DSL, amendments to Legal Basis of R.E.A.L. Alternative Provision School's role and additions made to the role of the Safeguarding Governor section

03/08/18 - Insert of guidance on *managing incidents of self harm*, and reviewed in line with the KCSiE 2018 recommendations and guidance.

04/11/18 - Insert of youth produced sexual imagery processes



08/11/17 - Review of policy. Sentence amended relating to the annual review of the policy.

30/05/17 - Changes made to the following sections: the role of the DSO (paragraph inserted); safeguarding young people with SEND (paragraph inserted); FGM (updates); Radicalisation (updates)

16/02/17 - Added information regarding informing Ofsted if a formal referral is made to the relevant LADO as advised at Ofsted inspection of befriending services 12.12.17

22/09/16 - Full review of policy. Amendments made in line with changes to national guidance from Keeping Children Safe in Education September 2016, and updates to the R.E.A.L policies on children absconding from education.

22/09/15: - Full review of policy. Amendments made in line with national guidance and inclusion of information from Keeping Children Safe in Education 2019.

01/09/2014: - Criminal Records Bureau (CRB) check has been replaced by the Disclosure and Barring Service (DBS).

01/09/2013: - No amendments to policy. Policy duplicated for R.E.A.L. Independent Schools.

01/09/2012: - Inclusion of allegations management flowchart included in the Safeguarding Policy based on guidance produced and distributed by the Nottingham City Council LADO.

01/09/2011: - Policy written for R.E.A.L. Education Ltd.