



Pace Education

Safeguarding and Child Protection Policy and Procedures

Version	Date	Updated by
1	1 st September 2020	Gabby Drinkall
2	1 st September 2021	Leo Guy & Caroline Bell

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1. Contact Details

Proprietor & Chair of Governors with responsibility for Safeguarding: Leo Guy

Mobile: 07702545156

Email: lguy@edison-yp.co.uk

Lead DSL: Caroline Bell

Number: 07743 741124

Email: cbell@edison-yp.co.uk

Deputy DSL: Julia Holmes

Number: 01782 616660

Email: jholmes@pace-education.co.uk

First Response Team:

Number: 0800 1313 126

Email: firstr@staffordshire.gov.uk

Outside of office hours, we are asked to contact the Emergency Duty Team:

Number: 0345 604 2886

Email: eds.team.manager@staffordshire.gov.uk

To contact the LADO (Local Authority Designated Officer), we still go through the First Response Team:

Number: 0800 1313 126

Email: firstr@staffordshire.gov.uk

To raise a concern about a child at risk of radicalisation or extremism:

Call 01785 232054 or email: prevent@staffordshire.pnn.police.uk

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2. Introduction

Commitment:

Pace Education is fully committed to safeguarding the welfare of children and young people. As a school we recognise our responsibility to take all reasonable steps to promote safe practice and to protect and prevent children from harm, abuse and exploitation. We expect all governors and employees to share this commitment. Pace Education acknowledges our duty to act appropriately in response to any allegations, reports or suspicions of abuse or harm.

All staff will endeavour to work together through our policies, practices and procedures to encourage the development of an ethos which embraces difference and diversity and respects the rights of children and young people. We also encourage a culture of vigilance, where we recognise the importance of staff being alert to signs of changing risk and in listening to young people. We achieve this through promoting a culture of transparency, openness and honesty. Adults in our school take all welfare concerns seriously and we encourage our students to talk to us about anything that worries them. All children are listened to and their voices heard without exception. We will always act in the best interests of the child.

Pupils are taught about safeguarding as part of our curriculum, including how to keep themselves safe online. For example, the Personal, Social and Health Education curriculum covers important topics such as drugs, alcohol and substance misuse and the Relationships and Sex Education curriculum includes a focus on healthy relationships and consent. Children are taught how to recognise when they or others they know may be at risk and how to get help when they need it.

The principles upon which the PACE Education Safeguarding & Child Protection Policy is based are:

- The welfare of a child or young person will always be paramount
- The welfare of families will be promoted
- The rights, wishes and feelings of children, young people and their families will be respected and listened to
- Keeping children and young people safe from harm requires people who work with children and young people to share information
- Those people in positions of responsibility within the organisation will work in accordance with the interests of children and young people and follow the policy outlined below

Outcomes

Children feel safe and are safe. Children understand how to protect themselves and feel protected and are protected from significant harm including neglect, abuse and accident.

Reference guides

- Working together to Safeguard children, DfE 2018¹

¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/

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- Keeping Children Safe in Education, DfE 2021²
- What to do if you are worried a child is being abused³
- Sexual violence and sexual harassment between children⁴
- NPCC when to call to call the police⁵
- Copies of all Safeguarding Policies are kept within MyConcern, which also indicates when they were uploaded and when staff signed to say that they had read them. Printed copies are also available in the Staff Room for reference.

How we achieve this:

There are four main elements to our Safeguarding & Child Protection Policy and Procedures:

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

[Working Together to Safeguard-Children.pdf](#)

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912592/Keeping_children_safe_in_education_Sep_2020.pdf

³ <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

⁴ <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

⁵

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

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3. Roles and Responsibilities:

All adults working with or on behalf of children have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within the school. It also includes a shared responsibility to create and maintain a positive and safe environment for young people in which they feel able to share concerns and receive high quality pastoral, relational support when they are struggling with their emotional wellbeing and mental health. We work in partnership with families and even where additional support is required, we seek to work from a strengths-based model.

Governing Body & Proprietor:

Leo Guy is the Proprietor and acts as Lead Governor with responsibility for Safeguarding. His contact details are included at the beginning of this policy. In accordance with the statutory guidance “Keeping children safe in education” September 2021, Leo Guy and the directors of Edison Education will ensure that:-

- The school has its own child protection/safeguarding policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly via the school website.
- The school operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, the Headteacher, nominated Governors and other staff involved in the recruitment process have undertaken Safer Recruitment Training.
- There are procedures for dealing with safeguarding concerns and allegations of abuse against members of staff. In cases where safeguarding concerns or allegations are made against the Headteacher, Leo Guy will work with the LADO to manage the process.
- The Headteacher is designated to take lead responsibility for dealing with child protection (the “Designated Safeguarding Lead”) and that there are at least two PACE staff trained to act as DSLs.
- The Designated Safeguarding Lead and Deputy Safeguarding Lead undertakes effective training and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) using safeguarding briefings etc.
- All staff who work with children, undertake appropriate training which is regularly updated at least annually; and new staff who work with children are made aware of the school’s arrangements for child protection and their responsibilities (including this policy, Part 1 of Keeping Children Safe in Education, the pupil Behaviour Policy and how to respond if children go missing).
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead, Deputy DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children;

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- Any deficiencies or weaknesses brought to the attention of the Governing Body will be rectified without delay.
- The school contributes to inter-agency working in line with statutory guidance “Working Together to Safeguard Children” 2018 including providing a co-ordinated offer of Early Help for children who require this. This Early Help may be offered directly through school provision or via referral to an external support agency. Safeguarding arrangements take into account the procedures and practice of the local authority placing the child at Pace Education, as well as those of the host authority.

Headteacher & Designated Safeguarding Lead

The Headteacher of the school also acts as the DSL and will ensure that:

- The policies and procedures adopted by the Governing Body are effectively implemented and followed by all staff;
- Allegations of abuse or concerns that a member of staff or adult working at school may pose a risk of harm to children or young people are notified to the Local Authority Designated Officer;
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline number is also available and displayed on posters around school (0800 028 0285);
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children’s Social Care or the Police;
- Act as a point of contact and the provision of information to the Safeguarding Children Partnership on safeguarding and child protection;
- Liaise with Leo Guy, Director of Education about issues especially to do with ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- Report to the Leo Guy, Director of Education on any deficiencies and make recommendations about how these should be rectified without delay.
- Manage and refer cases of suspected abuse;
- Refer cases to the Channel programme (through the local police Prevent Engagement Team) where there is a radicalisation concern;
- Act as a source of support, advice and expertise within the school and liaising with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral, by liaising with relevant agencies.;
- Attend and contribute to child protection conferences and other multi-agency safeguarding meetings when required;
- Be alert to the specific needs of vulnerable children, especially those with a social worker, special educational needs, a disability and young carers and promote their educational outcomes by sharing relevant information with teachers and leaders about welfare, safeguarding and child protection issues;

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- Ensure each member of staff has access to and understands the school's safeguarding/child protection policy especially new or part-time staff who may work with different educational establishments;
- Ensure all staff have induction training covering child protection, the pupil behaviour policy, children who go missing and staff behaviour. Staff will be trained to recognise, record and report any concerns immediately they arise and will be provided with Part 1 of "Keeping children safe in education" and Annex A to those working directly with children;
- Keeping detailed, accurate and secure written records of concerns, actions and referrals using MyConcern software;
- Obtaining access to resources and effective training for all staff;
- Keep up to date with new developments in safeguarding by accessing briefings and journals.
- Where children leave the school, ensuring their child protection file is passed to the Designated Safeguarding Lead and signed for in the new school/college as soon as possible (best practice is in a face to face meeting) – this will be in advance of the pupil arriving where specific ongoing support is required;
- Maintaining and monitoring secure child protection records, including monitoring and acting upon individual concerns, patterns of concerns (e.g. children who repeatedly go missing);

For further information on the expectations of a DSL in school, please refer to Keeping Children Safe in Education 2021

Deputy DSLs:

The Deputy DSL will undertake the same level of training as the DSL and receive regular non-contact time in order to fulfil these important responsibilities and undertake regular training. They have a specific Job Description in relation to their pastoral role. They will be expected to deputise for the DSL as well as providing a thinking partner for supportive challenge and reflection.

All Staff at PACE Education:

Staff are in a close position to children and young people within schools, as they know the pupils and often develop a trusting relationship. They have regular contact with them and therefore are in the best position to know if a pupil is behaving in a way which could possibly indicate that they are being hurt or harmed. Any concerns, whether these are nagging doubts, worries concerns or based on information told to them, must be reported.

It is the staff member's responsibility to ensure that this information is acted upon. They have a duty to follow up with the DSL to ensure that action has been taken.

All Staff are responsible for:

- Taking part in safeguarding training provided by the school on child protection and specific safeguarding issues identified in Keeping Children Safe In Education September 2021
- Supporting and delivering a curriculum which promotes the prevention of and

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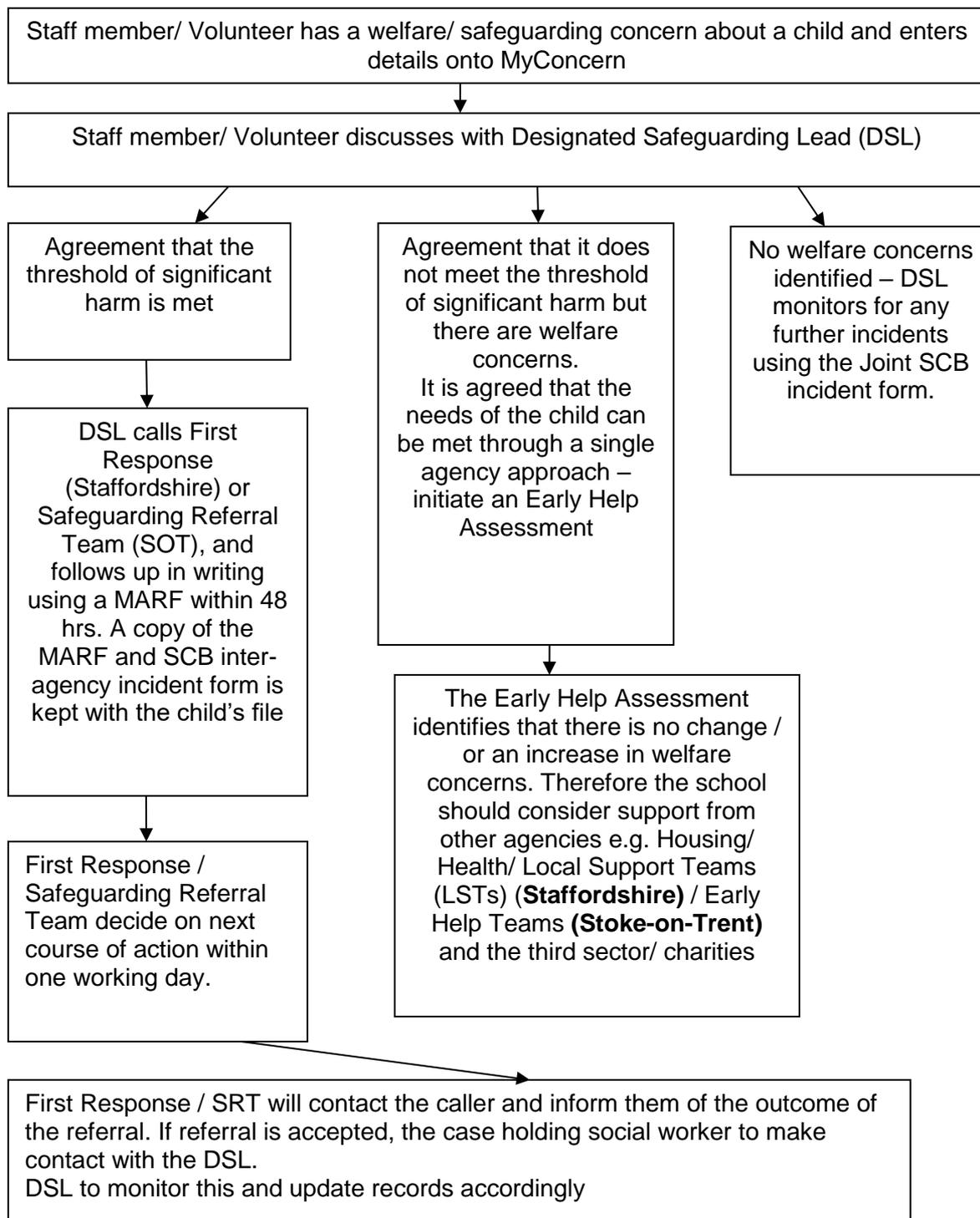
- protection from child abuse or harm
- Supporting the school in providing an atmosphere and ethos in which pupils feel secure and are encouraged to talk and be listened to
 - Listening to any child who approaches them wishing to share worries and concerns and to act in their best interests
 - Staff should be prepared to identify children who may benefit from early help, this means providing support as soon as a problem emerges
 - Staff should be able to support other professionals in an early help assessment and interventions
 - Being supportive of children and young people, while helping them understand that they cannot guarantee absolute confidentiality
 - Being alert to any signs of abuse or harm in the children and young people they have contact with
 - Promptly reporting any concerns through MyConcern, ensuring that they make an accurate record of the concern.
 - Serious concerns should immediately raised verbally with the Headteacher or Deputy DSL and then recorded on MyConcern.
 - Ensuring that allegations of abuse or misconduct by a member of staff are reported immediately to the Headteacher. Allegations of abuse or misconduct by the Headteacher should be reported to Leo Guy.

All staff have the right to refer to the local children's services directly, especially if they have doubts about the practice of senior staff.

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Flow Chart

What to do if you have welfare/ safeguarding concern's about a child



The **First Response Service** (Staffordshire) can be contacted on 0800 1313 126, or the Police on 101

Stoke-on-Trent Safeguarding Referral Team - 01782 235100
during normal office hours, or the Police on 101

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4. Definitions, Types and Signs of Abuse

Safeguarding

Safeguarding is defined in Keeping Children Safe in Education (KCSIE) 2021 as:

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

Due to the nature of our pupils' needs, we also utilise a contextual safeguarding approach.

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

Child Protection:

This refers to any actions that are taken to protect identified children who are suffering, or are likely to suffer, significant harm. Effective child protection sees a variety of agencies working together using a strengths-based approach to proactively safeguard and promote the welfare of children. Child protection should always intend to reduce the risk of harm to any child and where appropriate support the child's wider network.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused by an adult or adults or another child or children.

Physical Abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Indicators can include:

- Bruise marks consistent with either straps or slaps
- Bruising inconsistent with a fall
- Undue fear of adults - Fear of going home to parents or carers
- Aggression towards others
- Unexplained injuries or burns – part
- Injuries that occur to the body in places which are not normally exposed to falls, rough games, etc
- Reluctance to change for, or participate in games or swimming

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- Bruises, bites, burns, fractures etc which do not have an accidental/ satisfactory explanation
- Cuts/scratches/substance abuse
- Hitting (with the hand or implement) smacking, punching, kicking, slapping, twisting/pulling ear, hair or fingers, holding/squeezing with a tight grip, biting, and burning
- Abrasions particularly around neck, wrists and ankles
- Scalds especially with a well-defined edge from immersion in hot water
- Hair loss confined to one area (scalp may be sore and tender to touch)
- Frequent minor accidents without seeking medical advice and treatment
- Frequent absence from school

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

Institutions such as children's homes can be guilty of emotional abuse, including placing undue social restrictions on young people, using harsh and inappropriate sanctions and depriving them of their liberty without an appropriate process.

Potential Indicators

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging. Also depression/ aggression, extreme anxiety
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away/stealing/lying
- Reports of a person persistently humiliating, taunting or threatening the child whether in front of others or alone.
- Persistent lack of attention, warmth or praise.
- Radicalisation – use of inappropriate language, possession of violent extremist literature, behavioural changes, the expression of extremist views, advocating

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violent actions and means, association with known extremists, seeking to recruit others.

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

Potential Physical Indicators

- Wariness on being approached
- Soreness in the genital area or unexplained rashes or marks in the genital areas
- Pain on urination
- Difficulty in walking or sitting
- Stained or bloody underclothes
- Recurrent tummy pains or headaches
- Bruises on inner thigh or buttock.
- Eating disorders - anorexia, bulimia

Potential Behavioural Indicators

- Sexual knowledge inappropriate for their age
- Inappropriate sexualised behaviour, knowledge or language (which may be expressed in actions, words or drawings)
- Excessive need for love and affection – this may be expressed in ‘seductive behaviour’
- Wariness of adults
- Difficulty in trusting other children/young people and members of the peer group
- Any allegations made by a child concerning sexual abuse
- Sexual activity through words, play or drawing
- Child who is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Sudden changes in behaviour/mood for no apparent reason
- Self-destruction tendencies-suicidal attempts, self-mutilation, hair pulling
- Depression or anxiety
- Aggressive behaviour including hostility, irritability and defiance of authority figures
- Withdrawal from society/peer groups/communities

Neglect: the persistent failure to meet a child’s basic physical and/or psychological needs,

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likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Institutions such as children's homes can be guilty of neglect.

Indicators can include

- Exposure to danger/lack of appropriate supervision
- Hunger or under nourishment, failure to grow, stealing or gorging food
- Injuries that have not received medical attention
- Inadequate/inappropriate clothing
- Constant hunger
- Poor standards of hygiene
- Untreated illnesses
- Persistent lack of attention, warmth or praise
- Disturbed sleep pattern
- Passivity or depression
- Low self-esteem
- Lack of choices: deprivation of liberty (DOL)

Child Sexual Exploitation: Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and /or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. We follow the guidance set out in "Child sexual exploitation: definition and a guide for practitioners" DfE 2017.

Indicators can include

- Expensive gifts, increased access to money and mobile phones without a plausible explanation
- Gang association and/or isolation from previous peers and social networks
- Frequent absence from school
- Leaving home/care without explanation and persistently going missing or returning late
- Returning home under the influence of alcohol or drugs
- Relationships with controlling or significantly older individuals or groups
- Increased secretiveness
- Excessive texts/calls and multiple callers

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- Self-harm and significant changes in emotional well-being

Child Criminal Exploitation: CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something that the victim wants or needs, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears to have been consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Indicators can include

- Expensive gifts, increased access to money and mobile phones without a plausible explanation
- Gang association and/or isolation from previous peers and social networks
- Frequent absence from school
- Leaving home/care without explanation and persistently going missing or returning late
- Returning home under the influence of alcohol or drugs
- Relationships with controlling or significantly older individuals or groups
- Increased secretiveness
- Excessive texts/calls and multiple callers
- Self-harm and significant changes in emotional well-being

County Lines: this is a term used to describe gangs and organised criminal networks involved in the movement and distribution of illegal drugs using dedicated mobile phone lines or other forms of 'deal lines'. Exploitation is an integral part of the model, with children and vulnerable adults being exploited to move and store drugs and money. Children can easily become trapped by this type of exploitation through the use of drug debts; gangs use threats and acts of serious violence (including sexual violence) towards victims and their families.

Domestic Abuse: the Domestic Abuse Act (April 2021) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16 who are personally connected to each other:

- (a) Physical or sexual abuse
- (b) Violent or threatening behaviour
- (c) Controlling or coercive behaviour
- (d) Economic abuse
- (e) Psychological, emotional or other abuse.

The Domestic Abuse Act includes intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Children may be harmed by seeing, hearing or experiencing the effects of abuse.

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Peer on Peer Abuse and Bullying

Peer on peer abuse can take many forms, including but not limited to:

- a. Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- b. Sexual violence and sexual harassment
- c. Sharing sexual images (nudes and semi-nudes) previously known as sexting
- d. Abuse in intimate personal relationships between peers
- e. Physical abuse (hitting, kicking, biting, shaking, hair pulling)
- f. Sexting
- g. Initiating hazing type violence or ritual.

It is important that all staff recognise that children can and do abuse other children.

At Pace Education, young people receive a high level of supervision which minimise the risk of such abuse taking place onsite and also maximises the opportunities for staff to model appropriate and respectful relationships. However, we must not be complacent as it may still take place in ways that are less easy for us to detect e.g. through conversations children have outside of school, online and through social media. We also recognise that our young people can often struggle with maintaining friendships and may frequently appear to fall out with peers they have previously been close with. Staff must remain vigilant; at PACE we get to know our young people well and are well-placed to notice small changes in their well-being as well as to spot any early signs of inappropriate behaviour which could indicate an issue or develop into bullying or peer on peer abuse.

Peer on peer abuse is abuse. It must never be passed off as “banter”, “just having a laugh” or “part of growing up” as this can lead to a culture of tolerating unacceptable behaviours and make the environment unsafe and unsuitable for children and young people.

Staff must **therefore** report concerns or allegations to the DSL and safeguarding procedures will be followed, including informing parents.

Bullying

Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children should have adequate policies, procedures and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable'; it can even be encouraged and rewarded.

All incidents of Bullying must be reported and recorded on MyConcern, enabling us to identify and respond to emerging patterns e.g. discriminatory bullying both at an individual and a whole school level.

Definition of Vulnerable Child

A vulnerable child/young person is a person under the age of 18 and dependent on others in part of whole for their day-to-day well-being. Additionally, they are, or might be, at risk,

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from mistreatment (including a criminal offence) through acts of omission, or commissioned by those they depend on, or from, whom they cannot defend themselves. Many young people with mental health difficulties and poor attendance are at increased risk of harm, including exploitation. Children with a social worker or who have who has previously been “looked after” by a local authority are recognised as being at increased risk.

Child Victims of Trafficking

Trafficking of children is a form of human trafficking which means the recruitment, transportation, transfer, harbouring, and/or receipt of a child by means of a threat or use of force or other forms of coercion for the purposes of exploitation. Trafficking specifically targets the child as an object of exploitation; the child may be unaware of their fate:

Potential reasons for trafficking children

- Sexual exploitation
- Domestic servitude
- Sweatshops, restaurants and other catering work
- Agricultural labour, including tending plants in illegal cannabis farms
- Benefit fraud
- Involvement in petty criminal activity
- Organ harvesting
- Drug mules, drug dealing or decoys for adult drug traffickers
- Illegal inter-country adoption It is possible that unaccompanied asylum seeking children (UASC) may have been trafficked into the UK and are likely to remain under the influence of their traffickers, even whilst they are looked after. Any child who has been a victim of trafficking will have a risk assessment setting out how the child will be protected from any trafficker, to minimise any risk of traffickers being able to re-involve a child in exploitative activities. This plan should include contingency plans to be followed if the young person goes missing.

Signs that a child may be trafficked include

- Being withdrawn and refusing to talk or appearing afraid to talk to a person in authority
- Possession of large amounts of money or expensive belongings with no plausible explanation
- Frequent changes in residential placement

‘Honour Based’ Violence (HBV)

Incidents or crimes which are committed to protect or defend the honour of the family and/or the community.

This could include:

- Female Genital Mutilation (FGM)
- Forced Marriage
- Practices such as breast ironing.

All forms of HBV are abuse regardless of the motivation and will activate the school’s safeguarding procedures.

In instances of FGM, staff should report directly to the police if it appears that any FGM has been carried out, NOT report to the DSL first. If an intention to carry out FGM is

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suspected, staff should follow the usual reporting procedure and inform the DSL. Staff should not assume that FGM is always carried out in an 'at-risk' country, especially since the global pandemic has restricted travel opportunities.

Preventing Radicalisation

Children are vulnerable to extreme ideologies and radicalisation. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism takes many forms and all ideologies are included in this area of safeguarding:

- Islamic extremism
- Left-wing extremism
- Right-wing extremism
- Animal rights extremism.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and which specific needs for which an extremist or terrorist group may appear to provide and answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviours which could indicate that they may be in need of help or protection. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately, reporting their concerns or nagging doubts to the DSL who is also the school's Single Point of Contact (SPOC) for all Prevent and Counter-terrorism work.

Children Requiring Support with their Mental Health

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

Mental Health & Wellbeing

- All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood,

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adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

- More guidance Preventing and tackling bullying⁶
Mental health and behaviour in schools⁷
Promoting children and young people's emotional health and well being⁸

Schools can refer to the Mental Health and Behaviour in Schools guidance (2018)

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

The guidance provides advice on how to create a whole school culture in promoting positive Mental health outcomes for children and young people.

Local Arrangements for the School

All staff must be aware of local arrangements for safeguarding. PACE EDUCATION procedures are in line with Staffordshire Safeguarding Children's Board (SSCB).

First Response Team:

Number: 0800 1313 126

Email: firstr@staffordshire.gov.uk

Outside of office hours, we are asked to contact the Emergency Duty Team:

Number: 0345 604 2886

Email: eds.team.manager@staffordshire.gov.uk

To contact the LADO (Local Authority Designated Officer), we still go through the First Response Team:

Number: 0800 1313 126

Email: firstr@staffordshire.gov.uk

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

7

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf

8

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/414908/Final_EHWP_draft_20_03_15.pdf

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5. Safeguarding & Child Protection Practice and Procedures

Safeguarding Training

All staff within Pace Education are provided with safeguarding and child protection training as part of induction process and are provided with printed copies of this policy, together with copies of Keeping Children Safe in Education 2021 part one and Annex A and the Guidance for Safer Working Practice (2019). They will meet with the DSL or Deputy DSL to complete a face to face induction.

All staff complete a minimum of 1 face-to-face safeguarding training session annually and will also be given dedicated time during the school year to complete a series of online training sessions through Educare e.g. Prevent, Anti-Bullying etc.

All members of the Safeguarding Team will complete their advanced Local Authority DSL training every 2 years, in addition to attending briefings and reading regular updates. The Headteacher must also complete Allegations Management Training.

Partnership Working

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

General Data Protection Regulations

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

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

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

The GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on. Highly sensitive personal data such as that relating to safeguarding is shared on a need to know basis and we use MyConcern software which enables us to meet this duty through redaction even when some aspects of information need to be shared. For example, we can share a concern and chronology without revealing the name of the staff member who reported the concern.

PACE EDUCATION must ensure that they hold emergency contact details of the

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parents/carers of pupils on Scholarpack, our MIS. This is to be done with the agreement of the parents/carers. In line with KCSIE (2021), schools must hold more than one set of contact details for pupils.

Data breaches must be reported immediately to the Proprietor and to the Data Protection Officer as set out in the Data Protection Policy.

Preventative Strategies

The school will take all appropriate action to ensure that children and young people learn about appropriate relationships with adults, keeping safe, online safety as well as sex and healthy relationships. PSHE lessons, Relationships Education, and Relationships and Sex Education will focus on important age-appropriate issues in line with Government guidance. Staff must ensure that children and young people have opportunity to learn about safe relationships between peers as well as who they can talk to if they have any concerns.

Children should be supported by staff to understand what abuse is. Children must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse. This should include being able to access in private, relevant websites or help lines such as Childline to seek advice and help.

The school recognises that some children and young people are more vulnerable by virtue of their complex health or behavioural needs, or disabilities. In these instances, all staff have a responsibility to be the 'eyes and ears' and report all concerns to the Designated Safeguarding Lead.

For further information, refer to Part 5 of Keeping Children Safe in Education (2021) 'Child on Child Sexual Violence and Sexual Harassment'.

Children Missing Education

All staff must be aware of the risks associated with children who go missing from education, and particularly that very often missing incidents are a warning sign of other safeguarding concerns such as exploitation, forced marriage, FGM, substance misuse or mental health problems. The risk of exploitation and abuse increases for those children and young people who go missing from home and school.

Early identification and intervention is a priority. Schools must have appropriate procedures in place for monitoring the attendance of children and young people in school. Children and young people's attendance must be monitored through Senior Leadership Team Meetings and Governance.

The Head Teacher must ensure that there are two contact numbers on a pupil's file. The Designated Safeguarding Lead must contact the main emergency contact as detailed on the pupil's file should there be concerns regarding the pupil missing education.

Staff must report all unauthorised absences to the Designated Safeguarding Lead. The

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Designated Safeguarding Lead must make contact with the child or young person's parent/carer immediately to establish the child or young person's whereabouts. The Designated Safeguarding Lead must inform the placing authority of a pupil's poor attendance.

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

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

Safer Recruitment

The Edison Education Safer Recruitment Policy sets out the processes which must be followed for the recruitment of staff and volunteers.

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

Whistleblowing Policy

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

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

If staff are uncomfortable raising a concern in school, they can contact the proprietor

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directly.

Early Help Procedures

Keeping Children Safe in Education (2021) and Working Together to Safeguard Children (2018) set out a clear expectation that local agencies and schools will work together and collaborate to identify those children with additional needs and provide support as soon as a problem emerges.

Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. An Early Help Assessment should be initiated when welfare concerns are raised in relation to the child and their family. This should also be done when the support of more than one additional agency is needed in order to meet the child/family's needs.

The school will need to obtain parental/pupil consent for an EHA to be completed. Please refer to [Section 1E: Staffordshire's Threshold Framework: 'Accessing the Right Help at the Right Time'](#) / Stoke-on-Trent [Threshold Criteria for the Guide to Levels of Need for Children, Young People and Families](#) and the Joint SCB. We can consult [Information sharing guidance for practitioners](#) for clarity over what we should do if consent is refused.

The guiding principles of Early Help are:

- High quality early identification and intervention for all children who need it, as well as effective integrated support for children with the most complex needs;
- preventative approach: we aim to work with families to enable them to build resilience and improve their capacity to help themselves should problems arise in the future;
- early intervention may occur at any point in a child's life;
- children, young people and their families are listened to, practice is focused on their needs which is captured in the Early Help Assessment;
- The journey of the child is captured through their wishes and feelings;
- To achieve better outcomes for children, young people and families, we see early interventions and prevention as a shared responsibility, where agencies work together, jointly 'holding the baton' for children and families;
- Safeguarding is everyone's responsibility and the welfare of the child/young person is paramount.

Staffordshire and Stoke on Trent Safeguarding Children Boards are committed to an inclusive approach, involving parent/carers, children and young people, our school, relevant professionals and support services, which allows our school and practitioners to make informed and proportionate responses to need. There are four stages of need: Universal, Universal Plus, Targeted Early Help and Specialist & Statutory. Each stage provides a solution-focussed approach to meeting needs at the earliest opportunity, with the most appropriate and least intrusive level of intervention.

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Our school will usually provide support to children and their families at Stage One (Universal) and Stage Two (Vulnerable) of the staged intervention approach. This means that we will work with children and families at the earliest possible point to help them by listening to their needs and developing a support plan which takes into account any access that may be required to additional resources, expertise or to consider any adjustments that can be made in school. However, we will also at times support children and families who may need further support through the use of the “Early Help Assessment”, and the organisation of a “Team Around the Family”, a team which consists of members of staff from the school, parents/carers, the child or children (if it’s appropriate) and other professionals from services who may be able to support the family.

When concerns reach the threshold of Child in Need (S17 of the Children Act 1989)

A ‘Child in Need’ referral should be considered where the needs of the child are unlikely to be met under an Early Help Assessment, such as a child with complex disabilities, when a social work led assessment is required. In Staffordshire this is called a *Child Social Work Assessment* and in Stoke-on-Trent this is called a Child and Family Assessment.

Section 17 of the Children Act says that an assessment for services should be undertaken by the Local Authority in the following circumstances:

- Child(ren) are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority.
- Their health or development is likely to be impaired, or further impaired without the provision of such services.
- They are disabled.

If the DSL considers that the welfare concerns indicate that a ‘Child in Need’ referral is appropriate, he/she will speak with parents / carers and the child where appropriate and obtain their consent for referral to Staffordshire’s First Response team or the Safeguarding Referral team (SRT) in Stoke-on-Trent.

Consent: Whilst professionals should in general discuss any concerns with the child, their parents / carers and where possible seek their agreement to making referrals to First Response / SRT, **this should only be done where such discussion and agreement-seeking will not place the child or others at increased risk of suffering significant harm. Consent / agreement is not required for child protection referrals;** however you, as the referring professional, would need to where possible discuss with and inform parents or carers that you are making a referral as stated above, **unless** by alerting them you could be putting that child or others at risk.

With the exception of child protection, referrals will not be accepted by the First Response Service or the SRT based in the Multi Agency Safeguarding Hub (MASH)¹² without the child’s

¹² The Multi-Agency Safeguarding Hub (MASH) is the central resource for the whole of Staffordshire and Stoke-on-Trent receiving all safeguarding and child protection enquiries. The MASH is staffed with professionals from a range of agencies including police, probation, health and social care (adults

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parents/ carers having been consulted. If a discussion about the referral being made has not been held with the child, parents / carers the reason for this should be clearly shared with First Response / SRT at the time of the referral being made.

In the few cases where parents / carers have expressed an unwillingness to agree to the assessment process, the First Response Service (for Staffordshire families) or the Safeguarding Referral Team (for Stoke-on-Trent) will help to manage this difficulty.

Staff should be invited to participate in Child in Need (CIN) meetings convened by CSC when children are deemed to require section 17 services.

Some children in 'acute need' (see SSCB Threshold guidance/ [Stoke-on-Trent Guide to the levels of Need](#)) may require Child in Need Section 17 support.

Where a child is registered at PACE Education, staff should consult with the DSL or Deputy DSL who will usually be the most appropriate person to initiate any referral. A written record of concerns should be made using the incident record form contained within the **Staffordshire and Stoke-on-Trent SCB Joint Guidance on recording incidents** (www.staffsscb.org.uk www.safeguardingchildren.stoke.gov.uk)

If the child lives outside of Staffordshire/ Stoke-on-Trent, the matter will be referred by the DSL to the relevant Children's Social Care team in the area where the child resides.

As per statutory government guidance in **Working Together to Safeguard Children 2018** *anybody can make a referral*. However, due to the role of the DSL this member of staff may be party to additional and pertinent information and therefore is best placed to do so. If it is not possible to speak to the DSL or Deputy DSL, or there would be an unwarranted delay by doing so, the member of staff should contact the First Response Team (see front page for contact details) to discuss concerns or follow the Early Help Assessment. In these circumstances, the DSL must be informed about the referral as soon as possible.

The phone call must be followed up with written confirmation on the Multi-Agency Referral Form (MARF) within 48 hours. The MARF is available from the Staffordshire SCB website [Section 3C Multi-Agency Referral Form](#) / Stoke-on-Trent SCB website [C09 Multi-Agency Referral Form](#)

If the referral is accepted (i.e. meets the threshold), a social worker will contact the DSL and advise on next steps. This may involve sharing more information and attending a Child in Need Meeting.

On rare occasions, the social care team who have a bigger overview of risks affecting families may consult the school about the safety and wellbeing of a student on roll e.g. if a concern has been

and children). These professionals share information to ensure early identification of potential significant harm, and trigger interventions to prevent further harm. MASH staff gather information from every agency and use this to decide the most appropriate intervention to respond to the child's identified needs. Where appropriate, the MASH team is able to immediately trigger a response.

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raised about their sibling in another school.

Child Protection Concerns must also be reported to the First Response Team and time is of the essence, as you may even be advised not to let the child leave school in their taxi at the end of the day. Even if you have made previous referrals which have not been accepted, you must always continue to refer as the First Response Team will have a record of all previous concerns and will also have access to wider information about potential risk through their joined up work with other agencies including the police.

If a Section 47 (Child Protection) Investigation is instigated, the DSL will be required to attend and share relevant information.

If a child is already subject to a Child Protection Plan, the DSL will form part of the Core Group who work with the family to reduce the level of risk.

Summary of Procedures for staff responding to signs of abuse:

Respond to signs and indicators by recording and reporting to the DSL. Even if you have a nagging doubt, it is always worth discussing with the DSL.

Staff must make detailed recordings **on MyConcern**. Record exactly what is worrying you about a child's presentation or what a child, parent or taxi driver discloses to you, using their words as closely as possible. Try to distinguish and separate factual information from expressions of opinion, recording factual information and observations.

Listening to a child who tells you about a concern or experience

Always try to stop and listen straight away; a child may have been building up the courage to broach this subject with you for a long time and will easily be discouraged. If you cannot listen now, let them know that you want to make this time available to them and agree a specific time that day.

If you can, write a brief note of what they are telling you while they are speaking (these may help later if you have to remember exactly what was said, enter the information on MyConcern as soon as you can). If you do make notes, these should be scanned and entered onto MyConcern before being shredded.. If you don't have the means to write the time, make note of what was said as soon as possible afterwards.

- **Do not give a guarantee that you will keep what is said confidential or secret** – if you are told about abuse you have a legal responsibility to tell the right people to get something done about it. If asked, explain that you have to tell the people who can sort it out, but that you will only tell the people who absolutely have to know.
- **Do not promise it will all be alright.** You can promise to keep listening and supporting them though.
- Don't ask leading questions that might give your own ideas of what might have happened (e.g. "did he do X to you?") – just ask open questions "what do you want to tell me?" or "is there anything else you want to say?". "Tell me", "explain" and describe" can be helpful prompts which do not guide or lead the young person.

Sometimes when you tell children that you might have to tell someone about what they say, they decide not to speak anymore. Support them in their decision and give them some

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options. For example, ‘remember you can come back at another time. I’m always here for you’; or suggest another suitable adult; or reference a helpline, like Childline. Teenagers often need reminding that Childline is there for them too. The words ‘Child’- line sometimes give a false impression it is just for younger children so posters are now produced to try and counter that view.

During the discussion you should remain calm and react by:

- Listening carefully and ensure the vulnerable child/young person knows that you are taking what he/she says seriously
- Reassure the child/young person that he/she is doing the right thing in telling you
- Do not blame or appear shocked or angry
- Show empathy and concern; do not comment or make judgements
- Do not confront the alleged perpetrator; if it is a colleague, do not mention the allegation to any person other than your Headteacher. If the Headteacher is the subject of the allegation, report immediately to Leo Guy and the LADO.
- If the reported incident has happened recently, do not contaminate or remove any forensic evidence.
- Write everything down and inform a DSL. If for any reason a DSL is not available, you must inform the proprietor immediately.

You may wish to seek additional emotional support or supervision from the DSL to help you to process the emotional impact this has. It is important to recognise that the child has viewed you as a person they trust.

However difficult the process, all staff have a responsibility to report any suspicions or concerns that a child has or may be mistreated or harmed. *The child’s welfare is paramount.*

All forms of HBV are abuse regardless of the motivation and staff must report them. In most cases, staff should report concerns to the DSL. **In instances of FGM, staff should report directly to the police if it appears that any FGM has been carried out, NOT report to the DSL first.** If an intention to carry out FGM is suspected, staff should follow the usual reporting procedure and inform the DSL. Staff should not assume that FGM is always carried out in at ‘at-risk’ country, especially since the global pandemic has restricted travel opportunities.

Changes in accommodation:

Staff must also remain alert if a child talks about changes in accommodation as this may relate to private fostering or homelessness. **Always report these to the DSL.**

Mental health and wellbeing:

Staff who observe changes in a child’s mental health and wellbeing should raise this with the DSL.

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7. Procedures for Staff Responding to Peer on Peer Abuse and Bullying

Peer on peer abuse:

Record and report to the DSL

Peer on peer abuse can take many forms, including but not limited to:

- h. Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- i. Sexual violence and sexual harassment
- j. Sharing sexual images (nudes and semi-nudes) previously known as sexting
- k. Abuse in intimate personal relationships between peers
- l. Physical abuse (hitting, kicking, biting, shaking, hair pulling)
- m. Sexting
- n. Initiating hazing type violence or ritual.

Children can and do abuse other children. At Pace Education, young people receive a high level of supervision which minimise the risk of such abuse taking place onsite and also maximises the opportunities for staff to model appropriate and respectful relationships. However, we must not be complacent as it may still take place in ways that are less easy for us to detect e.g. through conversations children have outside of school, online and through social media. We also recognise that our young people can often struggle with maintaining friendships and may frequently appear to fall out with peers they have previously been close with. Staff must remain vigilant; at PACE we get to know our young people well and are well-placed to notice small changes in their well-being as well as to spot any early signs of inappropriate behaviour which could indicate an issue or develop into bullying or peer on peer abuse.

Peer on peer abuse is abuse. It must never be passed off as “banter”, “just having a laugh” or “part of growing up” as this can lead to a culture of tolerating unacceptable behaviours and make the environment unsafe and unsuitable for children and young people.

Staff must therefore report concerns or allegations to the DSL and safeguarding procedures will be followed, including informing parents. Some concerns may need to be reported to the police. *At all times the alleged victim and alleged perpetrator (and their parents/carers) will be supported and given guidance. Professional support will be sought if and as necessary.* It is important that all victims are taken seriously and offered appropriate immediate support as well as ongoing support during and after the subsequent investigation process. Alleged perpetrators also need to be supported and this may involve helping them understand what has been alleged and why this behaviour is unacceptable. It is possible that they themselves disclose ways in which they have been subjected to peer on peer abuse, within school or from young people in their local community.

A contextual safeguarding approach must be taken when considering possible peer on peer abuse. Children and young people who display harmful behaviours must be seen as potential victims themselves, and the wider environmental risks must be taken into account. Staff must challenge any gender bias or derogatory language used by staff or pupils. Staff must not dismiss any concerns brought to them by pupils. Staff can report concerns verbally

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but they must ensure that all concerns are reported on MyConcern and that the DSLs follow the procedures outlined below.

When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour. DSLs must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.

Designated Safeguarding Leads must deal with any concerns of peer on peer abuse immediately. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.

The language used must be sensitive, non-judgemental and must not blame the victim. Victims must be supported and reassured that their safety and welfare within the school is the priority. Risk assessments must be implemented where necessary.

KCSIE (2021) p 324: *“Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, take place at the same time if necessary”*

Where the Designated Safeguarding Lead believes that there has been significant harm caused to the pupil, *a referral must be made to the local authority*. If the local authority do not believe it meets their threshold for further action and the Designated Safeguarding Lead is not in agreement, this must be challenged with the local authority.

The Headteacher & DSL is responsible for ensuring that:

- a contextual safeguarding approach is taken;
- the school takes all necessary action to learn from the incident and prevent future incidents from occurring, such as through targeted education around specific types of peer on peer abuse;
- support for the victim is offered and provided where possible. If necessary, appropriate risk assessments must be implemented to provide reassurance and safety for the victim;
- schools must ensure that they **do not** adopt a victim-blaming approach;
- a trained DSL completes an investigation into the incident; The investigation must consider the occurrence of the incident itself as well as whether it is an isolated incident, and the personal circumstances of the young person who is alleged to have displayed harmful behaviour;
- if necessary, appropriate referrals must be made to support services for the young person who has displayed harmful behaviours;
- a risk assessment to be completed and implemented for the young person who has displayed harmful behaviours in order to safeguard them and other pupils.

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Bullying

Record and report to the DSL

Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children should have adequate policies, procedures and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable'; it can even be encouraged and rewarded.

PACE EDUCATION has a zero tolerance approach to bullying. All staff have a responsibility to challenge bullying, even at a low level. Ignoring bullying behaviour risks normalising it. Staff must help children and young people to understand what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Staff must report any bullying concerns to the Designated Safeguarding Lead **on the same day**. The concerns must be documented appropriately.

Schools have a responsibility to ensure that those children and young people who bully, are supported and helped to understand the impact of their actions.

For further information please refer to the school's anti-bullying policy and the DfE guidance 'Sexual violence and sexual harassment between children in schools and colleges' December 2017.

Depending on how the pupils feel and respond, it may be necessary to educate them separately and reduce opportunities for contact until a satisfactory conclusion is reached. As with all safeguarding concerns, parents and carers will be kept informed, unless there is an indication that doing so places a young person at increased risk of significant harm.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT+ children are at greater risk.

All Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviour risks normalising them. 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 is illegal and as such is a specific sexual offence.
- Recognising that children are capable of abusing their peers. This peer on peer abuse can take the form of physical abuse, sexual violence, sexual harassment, sexting and initiation ceremonies amongst other forms.

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- Reassuring victims that allegations will be passed to the Safeguarding team, and will be recorded, investigated and a resolution in place. At all times the alleged victim and alleged perpetrator will be supported and given guidance. Professional support will be sought if and as necessary.

8. Procedures for staff responding to signs of Child Criminal or Sexual Exploitation

Record and Report to the DSL

Staff **must** report concerns regarding criminal or sexual exploitation **immediately** to the Designated Safeguarding Lead. Staff must document their concerns appropriately on the same day using MyConcern.

Where there are low level concerns which do not meet threshold, Designated Safeguarding Leads must nonetheless continue to work with staff to record and report all signs and indicators in order to establish a fuller picture of what is happening for the child or young person.

It is everyone's responsibility to help children and young people know about grooming and exploitation

9. Managing Allegations made against staff, agency staff and visitors

Record and Report to the Headteacher, LADO and proprietor

Keeping Children Safe in Education (2021) considers an allegation to be any concern, complaint or disclosure that indicates a member of staff, agency staff or volunteer or has:

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

Following a disclosure or discovery of abuse, staff must inform the Head Teacher immediately, unless that person is the subject of the allegation. If the allegation is about the Headteacher then you should contact the Proprietor Leo Guy or contact the LADO directly through the First Response Team.

In the absence of the Head Teacher, the school Proprietor, Leo Guy must be contacted immediately.

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Anyone receiving an allegation about staff must report this and not make an early decision about whether the allegation is true. Some allegations may quickly prove to be unfounded or may relate to poor practice which can be addressed through training and support but the proper process MUST always be followed. Serious Case Reviews reveal tragic missed opportunities to protect young people from being harmed by people in a position of trust, because colleagues failed to act and take young people’s words seriously.

On referral, the Headteacher must immediately gather initial information as follows:

- Any initial notes from the staff member to whom the disclosure was made
- Any relevant information from case files on the person(s) involved
- Details from other agencies known to be involved
- At this stage the Headteacher should not commence any further interviews with staff or children/young people.

They must then share this information with the Local Authority Designated Officer (LADO). The LADO will give the school guidance on what to do next.

If there is a Police or social care led investigation, the LADO will instigate this and this should be completed before any internal investigation. It will be necessary in the investigation to identify if anyone else cared for by the alleged perpetrator is likely to have been abused and to agree a message concerning the absence of the alleged abuser to colleagues, pupils and parents and carers. It will not normally be necessary to await the outcome of a court case before instituting disciplinary action if sufficient evidence is available.

The LADO may however be happy for the school to investigate further and report back. Where a school-led investigation is advised by the LADO, an ‘investigating officer’ will be appointed by Leo Guy.

Staff subject to disciplinary proceedings should be kept informed of the allegations, progress of the investigation and given adequate support where necessary.

If there is a disciplinary hearing, it should be adjudicated by a Senior Manager who has not been involved in the investigation.

Part four of Keeping Children Safe in Education (2021) outlines the importance of retaining oversight of any concerns or allegations about agency or supply staff, volunteers or any member of staff employed by a third party working in the school setting. Whilst the individual may not be employed by PACE EDUCATION, the school must ensure that allegations are managed properly. KCSIE (2021) states *‘In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome. Governing bodies should discuss with the agency whether it is appropriate to suspend the supply teacher or redeploy them to another part of the school whilst they carry out their investigation.’*

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This section can feel daunting for staff to read but ultimately we all need to be committed to protecting vulnerable young people and trust the process. The LADO is an experienced professional and will make an informed judgement about the best way to proceed; likewise there are clear HR guidelines to protect staff who have been the subject of false or malicious allegations.

Staff can take a number of simple steps to protect themselves, including ensuring that they do not engage in 'low level concern' behaviours such as:

- Engaging with a child behind a closed door
- Using inappropriate sexualized, intimidating or offensive language, insults or engaging in 'banter'
- Taking their personal mobile phone into class/ on outings and using it to film or photograph young people

At Pace Education, we expect all staff to follow our Code of Conduct and be familiar with the Guidance for Safer Working Practice. If a member of staff is concerned that a current or planned activity may put them at risk, they should alert a senior member of staff as soon as possible so that protective measures can be put in place.

Physical Interventions

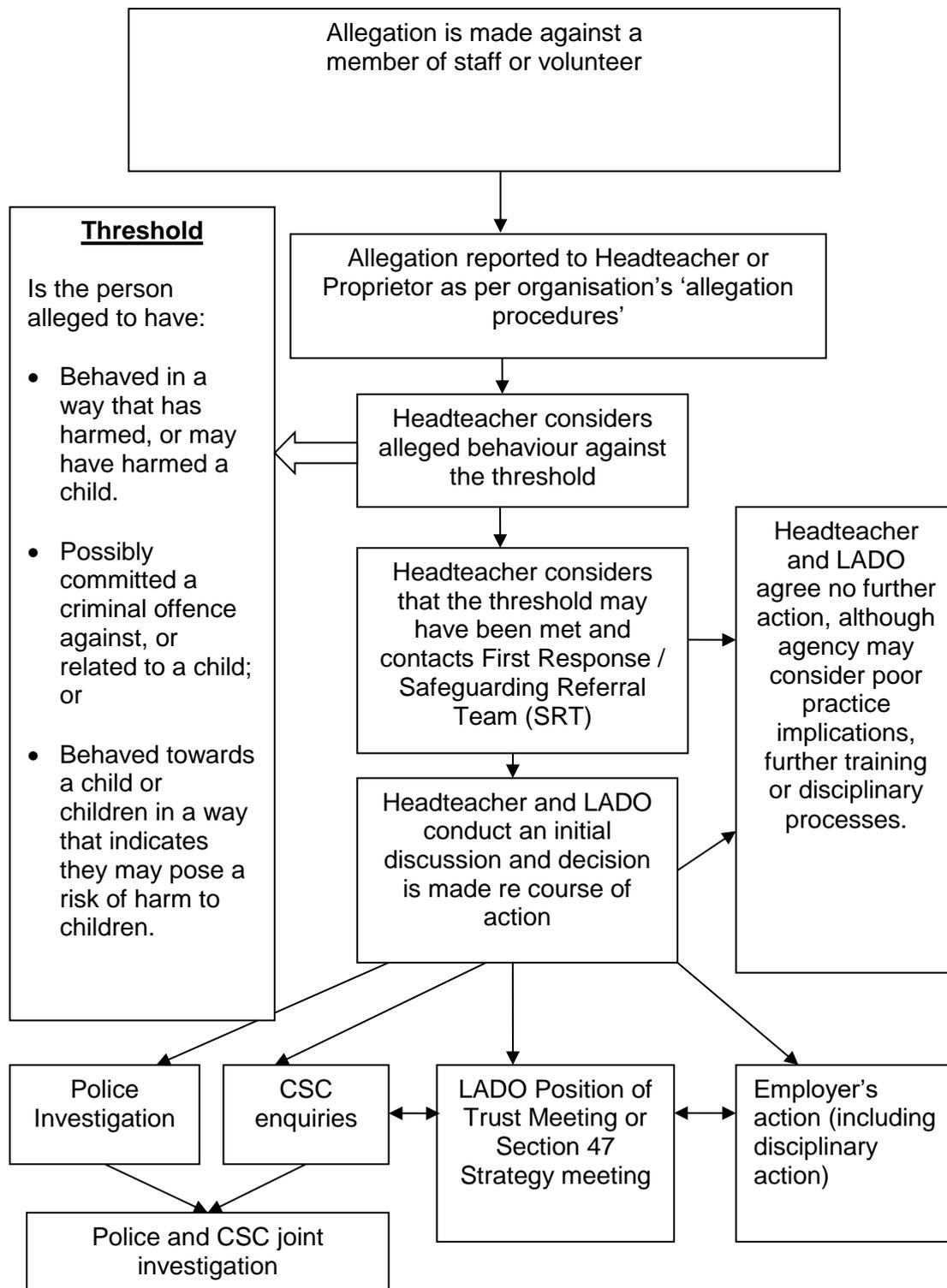
While Pace Education creates an atmosphere of nurturing, unconditional positive regard and warmth, and seeks to maintain a 'No Touch Policy', the school recognises that on rare occasions it may be necessary to use physical intervention to keep a young person or a colleague safe. Physical intervention **must be** a last resort and when used, must be reported and recorded on Scholarpack. We will always inform parents and carers if physical intervention has occurred as transparency is key. We will also offer debriefing for both staff and the young person and this will always be recorded.

If a child or young person makes an allegation after a physical intervention, it is important that the member of staff writes down as much information as possible. Staff must complete body maps immediately after the event and make an appropriate record. Staff must also verbally inform the Headteacher/Proprietor as well as recording it. **Medical attention must always be sought for the young person.** Staff must inform their parents or carers that the allegation has been made and that the school is following the appropriate procedure in partnership with the LADO.

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Flow Chart

Managing Allegations against Staff and Volunteers



LADO tracks progress, monitors and records outcomes
 Advises employer about duty to report to Disclosure and Barring Service (DBS) when appropriate

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