

Lawnswood Campus



Safeguarding & Child Protection Policy

Review Date: Autumn 2019

Please read

Governors as Management Board
Schools as PRUs

Signed by the Chair of the Management Board: Date:

Safeguarding Policy

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Introduction

Our safeguarding/child protection policy will describe procedures which are in accordance with government guidance and refer to locally agreed multi-agency, safeguarding arrangements put in place by the three safeguarding partners **(the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area in the local authority area)**. It will be updated annually (as a minimum), and be available publicly either via Lawnswood campus website or on request.

Lawnswood Campus PRUs recognise their legal duty under s175 Education Act 2002 and the 1989 Children Act and take seriously their responsibilities to protect and safeguard the interests of all children. They recognise that effective child protection work requires sound procedures, good inter-agency co-operation and a workforce that is competent and confident in responding to child protection situations. This document provides the basis for good practice within the PRUs for child protection work. It should be read in conjunction with Wolverhampton Safeguarding Children Board (MULTI-AGENCY PARTNERSHIP ARRANGEMENTS), Multi-Agency Child Protection Policies and Procedures. These are in keeping with relevant national procedures and reflect what the Directorate considers to be safe and professional practice in this context. Child protection has to be considered within professionals' wider "safeguarding" responsibilities that include a duty to co-operate under the Children Act 2004.

These procedures aim to provide a framework which ensures that all practice in the area of child protection is consistent with stated values and procedures that underpin all work with children and young people.

Lawnswood Campus PRUs recognise their legal duty under s.175/157 Education Act 2002 to work with other agencies in safeguarding children and protecting them from "significant harm". These duties are defined by:

"Working Together to Safeguard Children" July 2018

"Keeping Children Safe in Education" (Sept 2018)

"The inter-agency procedures of the Wolverhampton Safeguarding Children Board"

"Information Sharing" July 2018

"What to do if you are worried a child is being abused" (March 2015)

Data protection Act 2018 and GDPR

This document also seeks to make the professional responsibilities clear to all staff to ensure that statutory and other duties are met in accordance with Multi-agency partnership requirements and procedures.

Lawnswood Campus PRUs

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Chair of Management Board: Tim Gallagher

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Lawnswood Outreach Service:

Nigel Biddle Outreach Manager, DSL

Local Authority Safeguarding Contact Details:

Email: Multi-agency partnership arrangements@wolverhampton.gov.uk

Website: www.wolvesscb.org.uk

Safeguarding Service: 01902 550477

Designated Officer: Paul Cooper Tel: 01902 550661

Email: Paul.Cooper@wolverhampton.gov.uk

LAC Virtual Headteacher Darren Martindale

MASH Central Referral Hub: 01902 555392

Out of hours: 01902 552999

NSPCC: 0808 800 5000

NSPCC Whistleblowing helpline: 0800 0280285

Childline: 0800 1111

PREVENT: 101, option 3/Extension 8713036

Community Safety Team: 01902 551214 email: Safer@wolverhampton.gov.uk

Wolverhampton CSE Lead: Sandeep Gill Tel: 01902 550523

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1. What is Safeguarding?

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as

- Protecting children from maltreatment
 - Preventing impairment of children's health or development.
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children to have the best outcomes.
- (Children includes everyone under the age of 18.)

Summary

Safeguarding is what we do for all children and young people to keep them safe whilst in our care. Child protection describes the policy and procedures specifically for those young people who are at risk of serious harm or have been seriously harmed.

2. Underpinning Values

Where there is a safeguarding issue, Lawnswood Campus PRUs will work in accordance with the principles outlined in Keeping Children Safe in Education (KCSinE) Sept 2018:

“Safeguarding and promoting the welfare of children is **everyone's** responsibility.

Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.”

And Multi-Agency partnership arrangements and Child Protection procedures:

- Children's welfare is paramount. All children have a right to be protected from harm and exploitation and to have their welfare safeguarded.
- Each child is unique; Action taken by child welfare organisations should be child-centred taking account of a child's cultural, ethnic and religious background, their gender, their sexual orientation, their individual ability and special needs.
- Children, parents and other carers should be made aware of their responsibilities and their rights, together with advice about the power of professionals to intervene in their family circumstances.
- Each child has a right to be consulted about actions taken by others on his/her behalf. The concerns of children and their families should be listened to and due consideration given to their understanding, wishes and feelings.
- Individual family members must be involved in decisions affecting them. They must be treated with courtesy and respect and with due regard given to working with them in a spirit of partnership in safeguarding children's welfare.
- Open-mindedness and honesty must guide each stage of assessment and operational practice. The strengths of individual family members, as well as their needs, should be given due consideration.
- Personal information is usually confidential. It should only be shared with the permission of the individual concerned, or unless the disclosure of confidential personal information is necessary in order to protect a child. In all circumstances, information must be confined to those people directly involved in the professional network of each individual child and on a strict “need to know” basis.

- Professionals should be aware of the effects of outside intervention upon children, upon family life and the impact and implications of what they say and do.
- Explanations by professionals to children, their families and other carers should be plainly stated and jargon-free, unavoidable technical and professional terminology should be explained in simple terms
- Sound professional practice is based upon positive inter-agency collaboration, evidence-based research and effective supervision and evaluation.
- Early intervention in providing support services under Section 17 of the Children Act (1989) is an important principle of practice in inter-agency arrangements for safeguarding the welfare of children.

3. Multi-agency working:

- Lawnswood campus contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.
- We understand our role in the new safeguarding partner arrangements
- We co-operate and engage fully with the new published safeguarding arrangements
- Our campus will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Our PRUs will allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment
- Our safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the three safeguarding partners. This will include understanding and reflecting local protocols for assessment and the threshold document along with supplying information as requested by the three safeguarding partners.

4. Roles and Responsibilities

Role of Designated Safeguarding Lead

(see pages 4 and 5 for Lawnswood Campus DSLs and DDSLs)

At Lawnswood Campus the DSL for each PRU will be a senior member of staff from the Senior Leadership Team (SLT). The Executive Headteacher is also fully trained as DSL. The DSL will always have the lead responsibility for safeguarding and child protection. However, the activities of the DSL may be delegated to appropriately trained deputies. All responsibilities for safeguarding should be explicit in the job holder's job description (appendix A) as outlined in KCSinE, Sept 2018 annex B, pages 58-60. Each PRU will have one DSL and at least one DDSL.

The main responsibilities include:

- management of referrals
- effective multi-agency working
- acting as a point of contact with the 3 safeguarding partners (formerly Local Safeguarding Children's Board)
- the undertaking of relevant training

- to advise and support colleagues to raise awareness of all safeguarding & child protection issues
- Link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on local safeguarding arrangements.
- to ensure secure transit of CP file upon the transfer of a student
- to offer availability to staff at all times during both school term and out of term times
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- Liaison with staff (especially pastoral support staff, school nurses, IT Technicians and SENCos on matters of safety and safeguarding (including online digital safety) and when deciding whether to make a referral by liaising with relevant agencies

Role of Management Board (MB)

Lawnswood MB recognises its responsibilities to ensure that they comply with their duties under legislation. They will have regard to KCSinE Sept '16 and to ensure that the policies and procedures and training at Lawnswood Campus are effective and comply with the law at all times. At Lawnswood Campus we have a senior board level lead to take leadership responsibility for our safeguarding arrangements. The Management Board's responsibilities are outlined in KCSinE, Sept 2018, part 2, pages 14 – 21.

The main responsibilities include:

- to ensure safeguarding policies and procedures are in place
- to appoint a DSL who is a senior member of staff
- to ensure that the PRU staff work effectively with other statutory agencies in accordance with Multi –Agency partnership safeguarding procedures
- to ensure all staff attend and receive relevant training
- to ensure the Centre has appropriate filters and monitoring systems in place
- to ensure that opportunities are given to teach students about safeguarding
- a regard for and be familiar with current Ofsted inspection framework
- to ensure safer recruitment procedures are in place and adhered to
- to ensure procedures are in place to handle allegations against teachers, headteachers, volunteers and other staff
- to ensure procedures are in place to address peer on peer abuse
- to ensure the child's wishes and feelings are taken into account when determining what actions to take
- to ensure that staff have the skills, knowledge and in understanding necessary to keep children safe
- to appoint an appropriately trained Designated teacher to promote the educational achievement for LAC
- to ensure effective liaison with the Virtual School Head.
- to ensure that our safeguarding policy reflects that fact that additional barriers can exist when recognising abuse and neglect in children with SEND

The DSL or EHT will complete an Annual Safeguarding Report for Governors.

All Staff Responsibilities

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and their carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professions should make sure their approach is child-centred. This means that they should consider at all times, what is in the best interests of the child. All staffs' responsibilities are outlined in KCSinE, Sept 2018, Part 1, pages 5-13.

The responsibilities of all staff include:

- to provide a safe environment in which students can learn
- to be prepared to identify students who may benefit from early help.
- to support other agencies and professionals in an EHA
- to make referrals for any student for whom they have a welfare concern
- to be aware of systems within our centre to support safeguarding
- to read and understand the safeguarding policy, the Centre's Code of Conduct, Part 1 of KCSinE, Sept 2018 and other related policies and understand the role of the DSL
- to attend statutory training

All staff should be aware of the seven golden rules for sharing information, if in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

Parental Responsibilities

At Lawnswood Campus, we have an open door policy where we encourage parents to share any concerns regarding their own children or any other child/children who they feel may be at risk of harm. All concerns will be explored in a sensitive and timely manner.

Student Responsibilities

In our PRUs we respect our students. The atmosphere is one that encourages all children to do their best and to talk freely about any concerns or worries. We provide opportunities that enable our students to take and make decisions for themselves. Children will always be taken seriously and listened to if they seek help from a member of staff. Our school encourages all pupils to share any worries or concerns with any adult in the school at any time.

5. Training and Induction

DSL and DDSL

At Lawnswood Campus, the Designated Safeguarding Leads (and deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.

The DSLs will undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills will be refreshed through a programme of CPD tailored to the Centre's identified needs at

regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.

All Staff

All staff members will, undergo safeguarding and child protection training at induction. In addition, all staff will receive safeguarding and child protection training including online safety, Prevent awareness and FGM awareness. Updates will take place as required but at least annually.

Staff will be given the opportunity to share their knowledge and expertise to contribute and shape safeguarding arrangements and policies at Lawnswood Campus.

At Lawnswood Campus we will ensure that at least one member of any recruitment panel will have undertaken Safer Recruitment training. Lawnswood has an induction process that all new employees will undertake to ensure familiarity with the Centre's safeguarding procedures.

6. Types and Signs of Abuse and Neglect

All staff at Lawnswood Campus are familiar with and aware of the types of abuse and neglect. Staff are expected to be vigilant at all times. If staff have significant concerns about any child they will make them known to the PRU's Designated or Deputy Designated Safeguarding Leads. These concerns may include:

7. Categories of Abuse: Key Definitions

Physical Abuse

"Physical abuse 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." Some signs of physical abuse could be:

- Bruising of various ages
- Bite marks
- Burns and scalds
- Fractures in non-mobile children
- Injuries in unusual areas or with well - defined edges
- Old injuries or scars
- Refusal to discuss injuries
- Inconsistent explanations
- Talk of punishment which seems excessive
- Arms and legs kept covered in hot weather
- Reluctance to remove clothing for PE or swimming

Emotional Abuse

"Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), 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, though it may occur alone". Some signs of emotional abuse could be:

- Physical, mental or emotional development delay
- Abnormal attachment to parents/carer
- Low self esteem
- Lack of confidence
- Over-reaction to making mistakes
- Fear of new situations
- Fear of parents being contacted
- Self-harm

Sexual Abuse

"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 (e.g. rape, or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside the clothing. They may include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, 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". Some signs of sexual abuse could be:

- Aggression
- Withdrawn
- Self-harming, including eating disorders
- Distrust of familiar adult
- Wetting or soiling day and night
- Fear of undressing for sport or swimming
- Sleep disturbances or nightmares
- Apparent secrecy about social activities or special friends
- Inappropriate sexualized conduct
- Drawings of sexual behaviours
- Sexually explicit behaviour

Neglect

"Neglect is the persistent failure to meet a child's basic and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child from physical and emotional harm or danger;

- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs." Some signs of neglect could be:

- Under weight for age
- Hungry
- Tired
- Poor state of clothing for the child's size, weather or time of year
- Persistently dirty with a body odour
- Frequent lateness or non-attendance
- Compulsive stealing or scavenging
- Poor health and untreated medical problems
- Lack of immunisations
- Frequently missed medical appointments

The list of signs is not an exhaustive list. If staff recognise any of these signs they should not presume that the child is being abused, but must report their concern to the DSL.

Other specific safeguarding issues include

- Children missing from home or care
- Bullying, including cyber bullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Forced marriage
- Gangs and youth violence
- Gender based violence/ violence against women and young girls
- Mental health
- Sexting
- Relationship abuse
- Trafficking
- Child Sexual Exploitation
- Female Genital Mutilation (FGM)
- Hate
- Missing Children and adult strategy
- Private fostering
- Preventing radicalisation

For further information, please refer to KCSinE 2018, Annex A.

8. Children Missing from Education

The staff recognise that a child going missing from education is a potential indicator of abuse or neglect, including sexual exploitation. Staff are alert to the signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

Lawnswood Campus PRUs have an admission register and daily attendance registers. The school will inform the local authority of any pupil who fails to attend school regularly, or who has been absent without the school's permission for a continuous period of 10 school days or more. Lawnswood Campus PRUs employ Attendance Officers to monitor attendance.

The local authority will be informed if any pupil:

- is going to be deleted from the admission register.
- is taken out of school by their parents for home education
- has ceased to attend school or no longer lives within reasonable distance
- has been certified by the school medical officer as unlikely to be in a fit state of health
- is in custody for a period of more than four months due to a final court order
- has been permanently excluded.

9. CSE (Child Sexual Exploitation)

All staff are aware that Child Sexual Exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something as a result of engaging in sexual activities. Staff are alert to the potential signs e.g. pupils receiving food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection. Staff understand that CSE is an imbalance of power in the relationship. The school informs pupils about how to keep safe through the SRE Curriculum delivered by staff and the school nurses.

10. FGM (Female Genital Mutilation)

FGM involves partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK. The school is alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff have a concern they must immediately inform the DSL and complete a Record of Concern proforma to activate protocols for multi-agency liaison with the police and social care. If a member of staff discovers that an act of FGM appears to have been carried out on a girl who is under the age of 18, they have a personal statutory duty to report it to the police. The individual teacher will be supported in this duty by the DSL or DDSL. It will be rare for staff to see visual evidence, and staff are aware that they should not be examining pupils.

11. Radicalisation

Protecting children from radicalisation is part of the Lawnswood Campus PRUs wider safeguarding duties. The PRUs recognise that during the process of radicalisation it is possible to prevent vulnerable young people from being radicalised. Staff understand that radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Although there is no single way of identifying an individual who is likely to become radicalised staff are aware of a range of factors that may contribute to this, e.g. influence of family and/or friends online, the use of the internet and social media. Pupils are taught how to keep themselves safe on-line as part of our E-safety curriculum. (See E-safety Policy)

12. Prevent

The school complies with the DfE Advice for Schools outlined in The Prevent Duty (June 2015)

The statutory guidance on the Prevent duty summarises the requirements on schools/PRUs in terms of the following four general themes.

1) Risk Assessment

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.

2) Working in partnership

Our school will work in partnership with parents, children, families and statutory agencies.

3) Staff Training

Our school will continually assess the risk in our local area and as a minimum our DSL will undertake Prevent awareness training to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

4) IT Policies

Our school ensures that suitable filtering is in place. Our pupils are taught to stay safe on-line. Our E-safety is integral to the school's IT curriculum.

At Lawnswood Campus, we aim to build the children's resilience to radicalisation by providing a safe environment and through particular aspects of the curriculum including SMVSC, British Values, PSHE, SRE and Citizenship. Training on Prevent will be delivered as required to the relevant staff.

All staff at Lawnswood are aware of their statutory duty to report Prevent concerns. To report Prevent concerns they will inform the DSL team who will subsequently contact Social Care and call the police on **101, option 3, ext: 871 3036** and make referrals to the channel panel.

13. Honour Based Violence

'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and will be handled and escalated as such. Staff will pass any concerns to the DSL team. Professionals in all agencies, and individuals and groups in relevant communities will be alerted to the possibility of a child being at risk of HBV, or already having suffered HBV.

Indicators

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

Actions

Staff understand their mandatory duty to report any concerns regarding a child that might be at risk of HBV to the DSL team who will then activate local safeguarding procedures.

14. Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and

culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. PRU staff will contact the Forced Marriage Unit if they suspect that a student is being subjected to any related concern in order to seek advice or information.

Contact: 020 7008 0151 or email: fmufco.gov.uk.

15. Peer on Peer Abuse

All staff are aware other safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Lawnswood Campus seek to minimise the risk of these through strategies such as a bespoke curriculum, mentoring and counselling facilities available to all students, regular Student Voice and Student Safe surveys and parent surveys. All allegations will be investigated thoroughly and sensitively as per the school's procedure of investigating allegations.

An allegation made by a child against another child will be investigated by the Senior Management or Pastoral team. If it is deemed to be a Safeguarding concern the DSL team would follow normal safeguarding procedures. All allegations of abuse made against other children are heard, investigated and dealt with individually. Every case will be considered sensitively.

At Lawnswood Campus we make clear to all staff students that abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up" (see page 19 paras 76-78, KCSinE). Any victims of peer on peer abuse will be supported appropriately by all staff but especially the PRUs pastoral team. In addition, referrals to the counselling team will be made if deemed necessary as a supportive measure.

16. Sexual Violence and Harassment Between Children

If an incident of sexual violence or sexual harassment occurs within our PRUs, we will follow the guidance set out in Part 5 of Keeping Children Safe in Education and we will use the DfE guidance Sexual violence and harassment between children in schools and colleges (May 2018)

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. It is likely, this will adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

At Lawnswood Campus all victims will be taken seriously and offered appropriate support. We know that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff are aware and know 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 behaviours risks normalising them.

Sexual violence:

Our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Legislation.

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent:

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment:

Sexual harassment means ‘unwanted conduct of a sexual nature’ that can occur online and offline. For this policy, reference to sexual harassment, is in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (we will consider when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

Lawnswood campus' response to a report of sexual violence or sexual harassment:

Our PRUs will follow the guidance set out in part 5 Keeping Children Safe in Education and the DfE guidance Sexual violence and sexual harassment between children in schools and colleges -May 2018

- Any decisions made upon receipt of a concern will be made on a case-by-case basis by the designated safeguarding lead or deputy who will liaise with social care and or the police if necessary.
- All staff who have a concern regarding sexual violence or sexual harassment will speak with and report their concern to the designated safeguarding lead or deputy immediately
- All victims will be reassured that they are being taken seriously and they will be supported.
- All staff will act in the best interest of the child/student
- Our staff will be supportive and respectful of the child/student
- Our staff will listen carefully to the child/student, they will be non-judgemental and will not ask leading questions
- Our staff will not promise confidentiality and will explain that the information will be shared with those people who will be able to help and progress the report.
- A record of the report will be made. Best practice is to wait until the end of the report and immediately write up a thorough summary. It may be appropriate to make notes during the report however staff must remain engaged with the child/student, listen very carefully and not be distracted by note taking.
- The record will only include the facts as the child/student presents them. We understand that the notes should not reflect the personal opinion of the note taker and we are aware that the notes could become part of a statutory assessment by social care or part of a criminal investigation
- Where the concern includes an online element, we know we should not view or forward any images unless there is a valid reason to do so and we will follow the DfE guidance set out in Screening, searching and confiscation (January 2018) advice.
- Where possible we will try to manage and record an initial report with two members of staff present preferably one of them being the designated safeguarding lead or deputy.
- If the designated safeguarding lead or deputy is not involved in the initial report the staff member will speak to the designated safeguarding lead or deputy immediately.

Risk assessment:

If we receive a report of sexual violence or harassment, the designated safeguarding lead or deputy will make an immediate risk and needs assessment. This will be considered on a case-by case basis

Our risk and needs assessment will consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at our PRUs, especially any actions that are appropriate to protect them

Our risk assessment will either be a written/ an electronic record and will be reviewed and updated regularly. We will continually and actively consider the risks posed to all students and we will put adequate measures in place to protect and keep them safe.

Our designated safeguarding lead or deputy will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Any such professional assessments should be used to inform the PRUs' approach to supporting and protecting our students and will be used to update our own risk assessment.

Actions to consider following a report of sexual violence and/or sexual harassment:

Following a report of sexual violence and/or harassment we will consider:

- the wishes of the victim in terms of how they want to proceed (in an age appropriate way.) This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children, adult students or school or college staff; and
- other related issues and wider context e.g. contextual safeguarding.

Managing a report:

We will consider every report on a case-by-case basis. When to inform the alleged perpetrator will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, generally, our PRU will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, as per general safeguarding principles, this will not stop our PRUs taking immediate action to safeguard our children, where required.

Lawnswood campus will consider four likely scenarios when managing any reports of sexual violence and/or sexual harassment.

We will either manage the report:

1. Internally
2. Consider early help
3. Refer to social care
4. Report to the police

Considering bail conditions:

Lawnswood campus will have due regard for the information available in KCSiE part 5 and the DfE sexual violence and harassment guidance regarding bail conditions.

- When there is a criminal investigation, without bail conditions, our campus will work with children's social care and the police to support the victim, alleged perpetrator and other students involved (especially potential witnesses). Where required, we will seek advice from the police to help our PRUs manage our safeguarding responsibilities.
- The term 'Released Under Investigation' or 'RUI' will replace those previously on bail for offences in circumstances that do not warrant the application of bail to either re-attend on a particular date or to include conditions preventing activity or in some cases ensuring compliance with an administrative process.
- Where bail is deemed proportionate and necessary, our PRUs will work with children's social care and the police to manage any implications and safeguard our students. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

Managing any delays in the criminal process:

- There may be delays in any case that is being progressed through the criminal justice system. Lawnswood campus will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children in the school or college. We will use a risk assessment to help inform any decision.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, our designated safeguarding lead or deputy will work closely with the police (and other agencies as required), to ensure any actions our PRUs take do not jeopardise the police investigation.
- If our setting has questions about the investigation, we will ask the police.

The end of the criminal process:

- If a child/student is convicted or receives a caution for a sexual offence, our PRUs will update our risk assessment, ensure relevant protections are in place for all students and, we will consider any suitable action in light of our behaviour policy. If the perpetrator remains in our PRU with the victim the Head of Centre / Executive Head will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions are considered by us to be reasonable and proportionate regarding the perpetrator's timetable.

We will ensure both the victim and alleged perpetrator remain protected, especially from any bullying or harassment (including online).

Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

Safeguarding and supporting the victim:

The following principles are based on effective safeguarding practice will be considered to safeguard and support the victim.

- The age and the developmental stage of the victim
- The needs and wishes of the victim (along with protecting the child). It is important they feel in as much control of the process as is reasonably possible.
- Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority will be to make the victim's daily experience as normal as possible, so that our PRU is a safe space for them.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape. Support can include: Children and Young People's Independent Sexual Violence Advisors (ChISVAs), Rape Crisis, The Survivors Trust, CAMHS, Rape Crisis centres and the Internet Watch Foundation

Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When ongoing support will be required, we will ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's. We will respect and support this choice.

We understand that a victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While we will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, we will provide a physical space for victims to withdraw.

We will do everything we reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Whilst the victim will be given all the necessary support to remain in our PRUs, if the trauma results in the victim being unable to do this, alternative provision or a move to another educational setting should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

If the victim does move to another educational institution (for any reason), the new educational institution will be made aware of any ongoing support needs. The designated safeguarding lead will take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

Safeguarding and supporting the alleged perpetrator:

The following principles are based on effective safeguarding practice and will help shape any decisions regarding safeguarding and supporting the alleged perpetrator:

The age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

Consider the proportionality of the response. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will seek advice, as appropriate, from children's social care, specialist sexual violence services and the police.

It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

17. 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. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. A referral to the National Referral Mechanism will be considered by our PRUs. 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;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

18. Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Our school will use the age appropriate guides to support children, 5-11-year olds and 12-17 year olds. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. Our school will use the Ministry of Justice online child arrangements information tool to support this process and will make this information available to parents and carers if they require our assistance.

19. Children with Family Members in Prison

Some children who attend our PRUs may have a parent who has been sent to prison. Our PRUs will utilise the information NICCO provides designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

20. Domestic Abuse

Domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Our PRUs will make use of the advice and links available in Keeping Children Safe in Education (Annex A) to identify children who are affected by domestic abuse and how they can be helped.

21. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. When required our designated safeguarding lead or deputies will obtain contact details and know referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and will not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Our PRUs staff will consider homelessness in the context of children who live with their families, and intervention will be on that basis. However, we will also recognise in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and our designated safeguarding lead (or a deputy) will ensure appropriate referrals are made based on the child's circumstances.

22. The Use of 'Reasonable Force'

Our Managers know and understand there are circumstances when it is appropriate for our staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of

physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Our school does not adopt a 'no contact' policy, we have a policy which allows and supports our staff to make appropriate physical contact that enables staff to fully support and protect our pupils and students. The decision on whether or not to use reasonable force to control or restrain a pupil/student is down to the professional judgement of the staff concerned and will always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, our PRUs will consider the risks carefully and recognise the additional vulnerability of these groups. We will also consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, our PRUs can reduce the occurrence of challenging behaviour and the need to use reasonable force.

23. British Values Statement for Lawnswood Campus

The Department for Education (DfE) has introduced a statutory duty for schools to promote British Values more actively from September 2014, and to ensure they are taught in schools.

Lawnswood Campus is committed to serving its community which is taken from all over Wolverhampton. It recognises the multi-cultural, multi-faith and ever-changing nature of the United Kingdom and our local area. It also understands the vital role it has in ensuring that groups or individuals within the school are not subjected to intimidation or radicalisation by those wishing to unduly, or illegally, influence them.

It follows equal opportunities guidance which guarantees that there will be no discrimination against any individual or group, regardless of faith, ethnicity, gender, sexuality, political or financial status, or similar. The Lawnswood Campus is dedicated to preparing students for their adult life beyond the formal curriculum and ensuring that it promotes and reinforces British values to all its students.

The government set out its definition of British values in the 2011 Prevent Strategy. The five key British Values are:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of those of different faiths and beliefs

Lawnswood Campus uses strategies within the curriculum and beyond to secure such outcomes for students. Below are some of the ways that we seek to instill British Values:

Democracy:

The principle of democracy is consistently reinforced and, where possible, the democratic process is used for important decisions within the PRUs. School Councils operate and follow a structure similar to the British electoral system. The School Council feedback directly to the Head of Centre. The principles of democracy are also explored in subjects such as History and Religious Studies as well as in form time.

The Rule of Law:

The importance of laws, whether they be those that govern the class, the PRU, or the country, are consistently reinforced through the actions of our PRUs. We have a strong set of rules that students are consulted on. The laws of the land, particularly school rules, to deal with attendance, punctuality and behaviour are promoted through form time, lessons, interventions and mentoring. Students are taught the values and reasons behind laws, that they govern and protect us, the responsibilities that this involves and the consequences when laws are broken. Visits from authorities such as the Police and Fire Service are regular parts of our calendar and help reinforce this message.

Individual Liberty:

At Lawnswood Campus, our students are actively encouraged to make independent choices knowing that they are in a safe, secure and supportive environment. As PRUs we educate and provide boundaries for students to make choices safely, through the provision of a safe environment and an empowering education. Students are encouraged to know, understand and exercise their rights, responsibilities and personal freedoms and receive advice about how to exercise these safely, for example through our exploration of E-Safety in computing and their form time activities

Mutual respect

The relationship between staff and students is a key driver in all we do at Lawnswood Campus. This is based on an open respect agenda, a cornerstone of our working practices.

The PRUs promotes respect for others and this is reiterated throughout our environment. In line with our commitment to democracy students are always able to voice their opinions and we foster an environment where students are safe to disagree with each other. Mutual respect is embraced throughout the curriculum from the concept of 'fair play' in PE to the mutual respect and support between students across different year groups within the PRUs and across the Campus.

Tolerance of Those of Different Faiths and Beliefs:

This is achieved through equipping students with the ability to understand their place in a culturally diverse society and by giving them opportunities to experience such diversity within the school community and our workforce also represents and supports this.

Within the curriculum, we run a number of trips throughout the academic year from which our students gain valuable experience of other cultures and languages. Additionally, students are actively encouraged to share their faith and beliefs within the PRUs. The agreed Wolverhampton Religious Studies curriculum provides a broad and balanced education on a range of faiths, religions and cultures.

24. Private Fostering Arrangements

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made

between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity).

All staff at Lawnswood Campus PRUs are aware of the definition of 'Private Fostering'. This is included in the Safeguarding Folder issued to all staff.

Our school is aware that we need to report any private fostering arrangements to the Local Authority.

25. Recording and Reporting Procedures

Upon raising a concern all staff will either email or speak to the DSL or a DDSL. One of the DSL team will then speak to the child and complete a 'Child Protection Concern Incident and Disclosure' report form where appropriate (see appendix A)

The record will:

- state who was present, time, date and place
- use the child's words wherever possible
- be factual/state exactly what was said
- differentiate clearly between fact, opinion, interpretation, observation and/or allegation;
- be written in ink and signed by the recorder.

All relevant written notes, records and any other information gathered will be passed on to the DSL or DDSL. Where referrals are not made by the DSL, the DSL will be informed with urgency.

If, at any point, there is a risk of immediate serious harm to a child a referral will be made to children's social care and/or the police immediately. Staff may be required to support social workers and other agencies following any referral.

All staff are aware of what to do if a student tells them he/she is being abused or neglected.

Staff have all been provided with a copy of the flow chart (see appendix B(i), (ii) and (iii)) setting out the process for staff to follow when they have concerns about a child.

All staff know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL, children's social care and other statutory agencies. Staff are aware that they should never promise a child that they will not tell anyone about an allegation- as this may ultimately not be in the best interests of the child.

If a child makes a disclosure the DSL team work with statutory agencies to support children and families subject to:

EHA - Early Help Assessment

CIN – Child in Need

CP – Child Protection

The DSL, DDSL (and Attendance Officer for EHAs relating to attendance) attend meetings, submit reports and keep records.

All records are kept securely within each PRU.

If early help is appropriate the DSL and DDSs will support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. They will also offer support in the reviewing and monitoring of the subsequent early help put in place as a result of the assessment.

Actions to be taken where there are concerns about a child are outlined in KCSinE, Sept' 2016. Page 10 (see appendix D).

26. Transfer of Students to Other Schools

When a student transfers to another school, if the student is on the child protection register, their social worker is contacted by the DSL and informed of the transfer. When a student leaves the centre, child protection records are passed onto the receiving school. When the child is moving to another authority, information is also passed onto the next school's DSL. Our centre will obtain a receipt from the receiving school to confirm they have received the file.

A **Multi-Agency Referral Form (MARF)** will be completed by the designated person or a person with their authority, who carries out the referral. It is accepted good practice to speak with the duty officer at social services prior to sending the form (555392 or 552999 out of hours). This allows for the possibility of any immediate action, which may be deemed necessary for the welfare of the child. The form should then be faxed to 01902 555329 or 01902 552999 after hours.

Responses from social services and details of case conferences are held in confidential files.

Staff with a concern or having been party to a disclosure are aware that they **must not investigate** further.

Points to Consider when Making a Referral:

Is this a child with unmet needs where health, development or achievement may be affected? Wolverhampton Supporting Children' Model says practitioners should complete an Early Help Assessment (EHA) when:

- Age appropriate progress is not being made and the causes are unclear or
- The support of more than one agency is needed to meet the child or young person's needs.

Is this child in need? S17 of the Children Act 1989 says:

- they are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development
- their health or development is likely to be impaired, or further impaired without the provision of such services.
- they are disabled.

Is this a child protection matter? S47 of the Children Act 1989 says:

- Children at risk or who are suffering significant harm.

- Children suffering the effects of significant harm
- Serious health problems.

27. Information Sharing and Confidentiality

If a child is at risk of significant harm the PRU will share their concerns and information with other statutory agencies. Parental consent will always be sought unless doing this is dangerous or may put the child at further risk of harm. The school adopts the principles outlined in DfE Information Sharing Guidance July 2018

- Our Managers understand that sharing information is vital in identifying and tackling all forms of abuse and neglect.
- Our Managers understand and recognise the importance of information sharing between practitioners and local agencies. Our Managers will ensure arrangements are in place that set out clearly the process and principles of information sharing within the PRUs and with the three safeguarding partners, other organisations, agencies and practitioners as required
- Our Managers understand the Data Protection Act 2018 and the GDPR places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- Our Managers understand the DPA 2018 and the GDPR are not barriers to sharing information where the failure to do so would result in a child being placed at risk of harm they understand that fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- Our Managers will ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR. Relevant staff should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- Our Managers will ensure that staff who need to share 'special category personal data' are aware that the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Where children leave our PRUs, the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt will be obtained from the receiving school, college or alternative educational provision. The file will be transferred separately from the main pupil file. Our PRUs will ensure key staff such as Designated Safeguarding Leads and SENCOs or the named person with oversight for SEN, are aware as required.
- In addition to the child protection file, our Designated Safeguarding Lead will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

All information and data is stored securely and any information or data is shared in line with the Data Protection Act 2018 requirements.

28. Talking to and Listening to Children

If a child chooses to disclose, all staff will:

- be accessible and receptive
- listen carefully and uncritically at the child's pace
- take what is said seriously
- reassure the child that they are right to tell;
- tell the child that you must pass this information on;
- make a careful record of what was said.

Staff will NEVER:

- take photographs or examine an injury
- investigate or probe aiming to prove or disprove possible abuse – never ask leading questions;
- make promises to children about confidentiality or keeping 'secrets'
- assume that someone else will take the necessary action;
- jump to conclusions or react with shock, anger or horror;
- speculate or accuse anybody;
- confront another person (adult or child) allegedly involved;
- offer opinions about what is being said or about the persons allegedly involved;
- forget to record what you have been told;
- fail to pass the information on to the correct person;
- ask a child to sign a written copy of the disclosure.

For children with communication difficulties or who use alternative/augmented communication systems, staff will take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns will be reported in exactly the same manner as for other children.

29. The Pupil Voice

The voice of the child will always be considered and child will always be assured that we will act in their best interests, however we do not make promises that we cannot keep.

Children and staff are encouraged to talk freely about concerns in the belief that they will be listened to and appropriate action taken. We have a zero tolerance towards bullying of any description and parents are given assurances that following a concern being raised that it will be dealt with at the earliest possible opportunity. A separate "Bullying" Policy is in place for everyone within the school community. (See Behaviour Policy)

30. Bullying and Racism

Our school records all bullying and racist incidents.
Any incidents of bullying or racism are reported termly to the LA.

31. The Child's Wishes

Children's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. Staff members do not promise confidentiality and always act in the best interests of the child.

32. Looked After Children (LAC) and Previously Looked After Children

The Designated Teacher for Looked After Children (LAC) for each PRU is outlined on pages 4 and 5 of this document. He/she is responsible for liaising with outside agencies to promote the educational achievement of children who are looked after.

Our designated teacher will undertake any relevant training to update their skills, understanding and knowledge to enable them to keep our looked after children and previously looked after children safe. Our designated teacher will promote the educational, physical, social and emotional welfare of children who are looked after and previously looked after children.

Previously looked after children are children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Our designated teacher will ensure:

- They are aware of the legal status (interim care order, full care order, voluntary arrangements of any looked after child at Lawnswood campus
- They obtain information regarding, contact arrangements with birth parents or those with parental responsibility
- They obtain information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him or her
- They obtain the name of the child's social worker
- They obtain the name and contact details of the virtual head in the local authority that looks after the child
- They liaise with the virtual school headteacher to discuss how the funding for that child can be best used to support the child's need outlined in the personal education plan.

33. Virtual School Head

The designated LAC will work with the Virtual School Head (Darren Martindale) for the LA to discuss how the Pupil Premium grant funding can be best used to support the progress of looked after children in the PRU and meet the needs identified in the child's personal education plan.

34. Children with Special Educational Needs and Disabilities

Lawnswood Campus are fully aware that additional barriers can exist when recognising abuse and neglect in students with special education needs and/or disabilities. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

This awareness is reflected in the Safeguarding policy and in practice.

35. Safer Working Practices

The school has a Code of Conduct where all staff are made aware of their roles and responsibilities at all times. This is contained in the Guidance for Safer Working Practice document and Teachers' Standards documents.

36. Recruitment, Supervision and Training for Staff

Newly appointed staff receive a copy of the Safeguarding Children in Education Induction Pack, which includes the Safeguarding policy, Code of Conduct, KCSinE part 1, role of the DSL and the Whistleblowing Policy as part of their induction programme. They are made aware of the PRUs procedures for Safeguarding and know what to do if they are worried a child is being abused.

Newly appointed staff receive statutory safeguarding training which is updated at least annually and they are also expected to attend Lawnswood Campus' ongoing CPD programme relating to safeguarding.

37. Safer Recruitment

Lawnswood Campus adheres to statutory responsibilities to check staff who work with children, making decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised.

The school recognises the duty to have at least one member of any interviewing panel who has received Safer Recruitment Training.

38. Recruitment Selection and Pre-employment Vetting Checks

The school makes decisions about the suitability of any prospective employees based on checks and evidence including; criminal record checks (DBS), barred list checks and prohibition checks, including EEA (European Economic Area) prohibition checks together with references and interview information.

Consideration is given to the regulated activity prospective employees will be engaged in. In summary, a person will be considered to be engaging in regulated activity if as a result of their work they;

- Will be responsible, on a regular basis in a school, for teaching, caring for or supervising children.
- Will carry out paid or unsupervised unpaid, work regularly in a school where that work provides an opportunity for contact with children.
- Engage in intimate or personal care or overnight activity, even if this happens only once.

For all other staff who have opportunity for regular contact with children who are not engaging in regulated activity, the school requires an enhanced DBS certificate, which does not include a barred list check. This includes contractors who would have the opportunity for contact with children.

All members of Management Board are also subject to DBS checks.

For anyone appointed to carry out teaching work, an additional check is undertaken by HR Department to ensure they are not prohibited from teaching.

Employees are not allowed to start work in regulated activity before the DBS certificate is available to the school in its original form. This must be shown by the holder on or before appointment or as soon as practicable after.

The school keeps a Single Central Record that complies with all the requirements. It is regularly monitored by the Executive Headteacher and Chair of Management Board.

39. Allegations of abuse made against teachers and other staff

All staff and Managers are aware of their duty to report any allegation that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. This is in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers)

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

Senior Leaders will provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. All allegations of abuse made against a teacher or other member of staff or volunteer will be dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

40. Managing Allegations

In the event of an allegation being made against all staff, the Head of Centre or the Executive Headteacher or DSL if appropriate will be informed who will liaise with the LA Designated Officer.

In the event of an allegation being made against the Head of Centre, the EHT will be informed who then liaises with the LA Designated Officer.

In the event of an allegation being made against the EHT, the Chair of Management Board will be informed who then liaises with the LA Designated Officer.

An allegation made by a child against another child will be investigated by the Senior Management or Pastoral Team. If it is deemed to be a safeguarding concern, the DSL team would follow normal safeguarding procedures. Allegations of abuse made against other children are heard, investigated and dealt with individually. Every case will be considered sensitively.

For any person in regulated activity who may be dismissed or removed, or who has resigned due to safeguarding concerns, the school would notify the DBS. We are aware of our legal duty to make this referral.

Wolverhampton LA Designated Officer (DO) – Paul Cooper (Tel: 01902 550661)

When an allegation is made, Lawnswood Campus will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

41. Protecting Yourself Against Allegations of Abuse.

You should seek to keep your personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working alone with children:

- work in a room where there is a glass panel in the door or leave the door open
- make sure that other adults visit the room occasionally
- avoid working in isolation with children unless thought has been given to safeguards.
- do not give out personal mobile phone numbers or private e-mail addresses
- do not give pupils lifts home in your car
- do not arrange to meet them outside of school hours
- do not chat to pupils on the social websites

Under the Sexual offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.

Any use of physical force or restraint against pupils will be carried out and documented in accordance with the relevant physical restraint policy. If it is necessary to use physical action to prevent a child from injury to themselves or others, parents will be informed. Children will not be punished by any form of hitting, slapping, shaking or other degrading treatment.

42. Curriculum

Child safety issues and child protection will be addressed through the curriculum where appropriate, especially through PSHE, Computing and E-Safety, Citizenship and Relationship and Sex Education (RSE).

Our teaching of personal, social and health education and citizenship helps to develop appropriate attitudes in our children and makes them aware of the impact of their decisions on others. We also teach them how to recognise different risks in different situations, and how to behave in response to them.

The school teaches the children how to keep themselves safe through;

- Educational Visits
- PSHE Assemblies
- RSE School Nurses
- British Values
- Healthy relationships
- Safer relationships
- Managing emotions
- Healthy Lifestyles & Wellbeing
- E-Safety

- PCSO Speakers – Talks on Bullying, Cyberbully, Stranger Danger, Firework and Park Safety
- SMSC embedded in to each Scheme of Work
- Accessing help and support
- Personal Safety
- Cyber Safety
- Road Safety

43. E-Safety

The E-Safety Leads, Mark Nesbitt (Orchard Centre), Stuart Playford (Braybrook) and Anthony Sankhara (Midpoint) are responsible, together with the IT technicians for ensuring that children are properly protected in their use of IT at school. We have an E-Safety policy which outlines the procedures to protect staff and pupils from inappropriate use of the Internet and mobile communications.

All parents are asked to sign and give permission to take photos and place these on the school's website or newsletters. (Parents have the right to say yes or no).

The school endeavours to teach the children how to keep themselves safe on line. The school has the appropriate filters and firewalls in place to protect the children. Access to the internet will be monitored regularly by the IT technicians and reported to the EHT if any inappropriate activity is noted (refer to the E-Safety Policy).

44. School Visits

Through the school's curriculum the children have the opportunity to go on school trips and residential visits to enhance their learning. All off-site visits are recorded. Permission slips and medical forms are collected and kept with the office and the lead member of staff for each PRU Risk assessments are completed and filed within the Visits Folders. See separate policy for School Visits.

45. Medical Procedures

All staff are routinely First Aid trained and receive refresher training at least annually. In addition to this, bespoke training will also take place according to any specific medical needs a student may have. If there is a requirement for medication to be administered during the academic day, parents are requested to provide the medication which will be kept securely in the Centre.

46. Site Security

At Lawnswood Campus we take site security seriously. All visitors to school are required to sign in at Reception and have to wear a visitor's badge. Staff are instructed to approach any adult in school that they do not recognise if they are not wearing a visitor's badge.

47. Resources

Safeguarding is important to all members of staff. Lawnswood Campus Management Board will ensure that sufficient resources are made available to enable the necessary tasks to be carried out in compliance with multi-agency partnership arrangements Procedures, this includes; attending meetings, collating and writing assessment reports, and staff training. The MB will also ensure that all Managers have an understanding of safeguarding issues and that policies and procedures are in place in school to safeguard and promote the welfare of all pupils. Safeguarding awareness will be addressed through the curriculum as appropriate to ensure all the pupils understand what is meant by safeguarding and how they can be safe.

48. Links with other Policies and Documents

This procedures document should also be considered with the context of other policies and documents relating to our work with children and young people. These might include:

Whistleblowing Policy (T Drive/Shared/Staff/Common/Policies/safeguarding)

Keeping Children Safe in Education – September 2018 (T Drive/Shared/Staff/Common/Policies/safeguarding induction)

Working Together to Safeguard Children 2018

Sexual Violence and Harassment in Schools and Colleges 2018

Information Sharing 2018

Working Together: transitional statutory guidance to support LSCBs 2018

Data protection Act 2018 and GDPR

E-Safety Policy

Behaviour Policies

SEND Policy

Children Act 1989. <http://www.legislation.gov.uk/ukpga/1989/41/contents>

Education Act 2002 <http://www.legislation.gov.uk/ukpga/2002/32/contents>

MARF 2015 (T Drive/Shared/Staff/Common/Policies/safeguarding)

This is not an exhaustive list

Appendix

- A** Senior Leader Child Protection/Safeguarding Duties in Addition to Job Description
- B** Child Protection Concern Incident and Disclosure
- C(i)** Safeguarding flow chart Orchard
- C(ii)** Safeguarding flow chart Midpoint
- C(iii)** Safeguarding flow chart Braybrook
- D** Actions where there concerns about a child, KCSinE, Sept 2018, page 10
- E** KCSinE updates on Sexting, CME and CSE
- F** 7 Golden rules of Sharing Information

SENIOR LEADER

CHILD PROTECTION/SAFEGUARDING DUTIES IN ADDITION TO JOB DESCRIPTION

GENERAL DUTIES

Take lead responsibility for safeguarding and child protection at the Centre.

Contribute to creating a safe and welcoming learning environment.

Ensure that child protection policies and procedures are understood by all staff members and are implemented correctly.

Provide comprehensive induction training to new staff and newly qualified teachers with the aim to strengthen their safeguarding skills and experience.

Identify pupils who may be at risk and use the correct protocol to reduce these risks.

Respond appropriately to disclosures or concerns relating to the wellbeing of a pupil.

Refer cases of suspected child protection issues to the appropriate investigating agency.

Work closely with staff on safeguarding and child protection matters, ensuring that staff members understand when it is necessary to make a referral.

Understand the assessment process for providing early help and intervention.

Keep detailed, accurate and secure written records of concerns and referrals.

Be alert to, and understand, the specific needs of vulnerable pupils.

Encourage a culture of listening to pupils and taking into account their wishes and feelings.

Organise adequate and appropriate cover arrangements for any out-of-hours/out-of-term activities.

Collaborate and effectively implement child protection plans.

Monitor pupils at risk of harm or those that have been subject to harm, providing support and ensuring their welfare.

Lead a team who will review and monitor any cause of concern relating to the welfare of pupils.

Act as the first point of contact for staff members to raise safeguarding and child protection concerns.

Receive regular safeguarding and child protection updates, ensuring the PRUs comply with all relevant legislation.

MULTI AGENCY WORK

Have a working knowledge of how LAs conduct a child protection case conference and be able to attend these, as well as effectively contribute to these when required.

Refer cases of suspected abuse to the LA and children's social care.

Where radicalisation is a concern, refer cases to the LA support programme and take advice from the LA.

Support staff members who make referrals to external agencies.

Notify the Disclosure and Barring Service (DBS) of staff who have been dismissed or have left due to posing risk or harm to a child.

Liaise with the police as and when required.

Liaise with the LA and follow up any referrals made, ensuring the PRU aids the LA's work where necessary.

Where necessary, securely transfer child protection files to other educational establishments, ensuring that confirmation of receipt is obtained.

Contribute to inter-agency plans to provide additional support to pupils subject to child protection plans.

Attend and contribute effectively to Child In Need meetings and child protection conferences, including those taking place out of normal working hours.
Ensure that the actions resulting from meetings are carried out in a coordinated way.
Work closely with the Management Board in order to create effective safeguarding policies and protocols.

TRAINING

Undertake appropriate training and updates on an annual basis.
Attend comprehensive safeguarding and child protection training at least every two years.
Ensure staff members have access to and understand the PRU's Child Protection and Safeguarding Policy and procedures.
Provide advice and support to staff members regarding child protection issues such as radicalisation.
Keep staff members up-to-date with guidance regarding safeguarding, including the Prevent duty
Ensure staff members are aware of training opportunities that are available to them.
Conduct safeguarding training as part of all staff members' induction programme.

RAISING AWARENESS

Act as a source of support, advice and expertise within the Centre.
Ensure the safeguarding and child protection policies are available publicly.
Review the Child Protection and Safeguarding Policy on an annual basis and present it to the Management Board for approval.
Continuously keep the Executive Headteacher and/or Head of Centre informed of any safeguarding issues or ongoing enquiries.
Ensure the Management Board is kept up-to-date on a regular basis regarding all child protection issues and investigations.
Maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.
Represent the PRU at designated leads meetings and circulate the information to staff members.
Ensure staff members receive frequent updates and are able to identify any safeguarding concerns.
Encourage staff members to challenge behaviour which breaches the Code of Conduct.
Provide written reports to the Management Board, Executive Headteacher or Head of Centre in a timely manner.
Collaborate with the personal, social, health and economic education (PSHE) coordinator in order to ensure that relevant safeguarding issues are covered within PSHE lessons.

Name:

Signed:

Date of amendment:

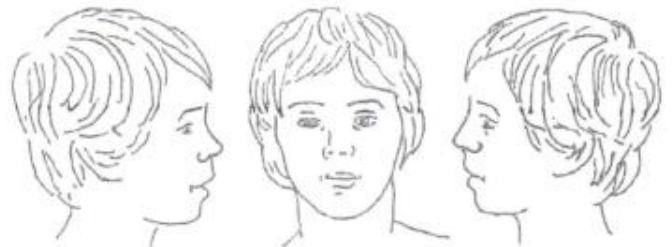
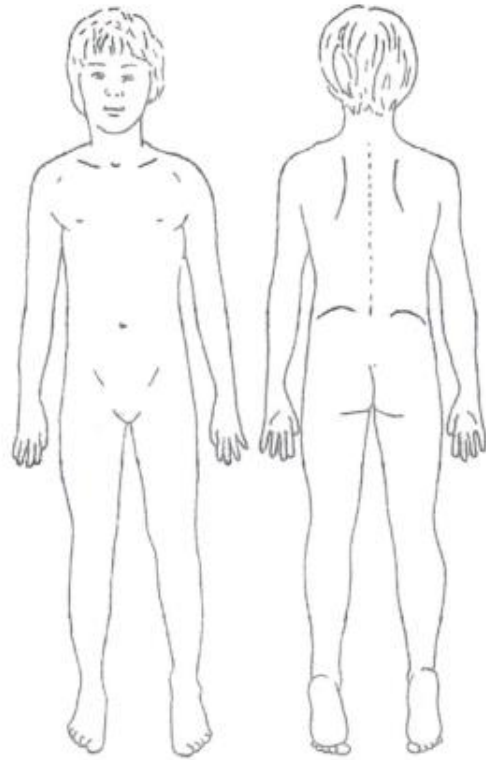
Child Protection, Concern, Incident & Disclosure Report Form

Name		Year:	DoB: / /
Please tick: Concern? <input type="checkbox"/> Incident? <input type="checkbox"/> Disclosure? <input type="checkbox"/>	<div style="display: flex; justify-content: space-between;"> <div>Date:</div> <div>Time:</div> </div> Where:		
What took place? What was said? (be factual & use the child's words where possible)			
Details of injury Body map attached? <input type="checkbox"/> (Please tick)			
Name of person reporting			
Signature of the above			

Action Taken

Child seen? Yes <input type="checkbox"/> No <input type="checkbox"/>	By whom? Details:
Child spoken to? Yes <input type="checkbox"/> No <input type="checkbox"/>	By whom? Details:
Social worker contacted Yes <input type="checkbox"/> No <input type="checkbox"/>	By whom? Date: Time: Name of Social Worker:
Police informed? Yes <input type="checkbox"/> No <input type="checkbox"/>	By whom? Date: Time: Name of Officer(s):
Parents informed? Yes <input type="checkbox"/> No <input type="checkbox"/>	By whom? Date: Time:
Further details / Actions	
Permission gained to go home? Yes <input type="checkbox"/> No <input type="checkbox"/>	By whom? Authorised by?

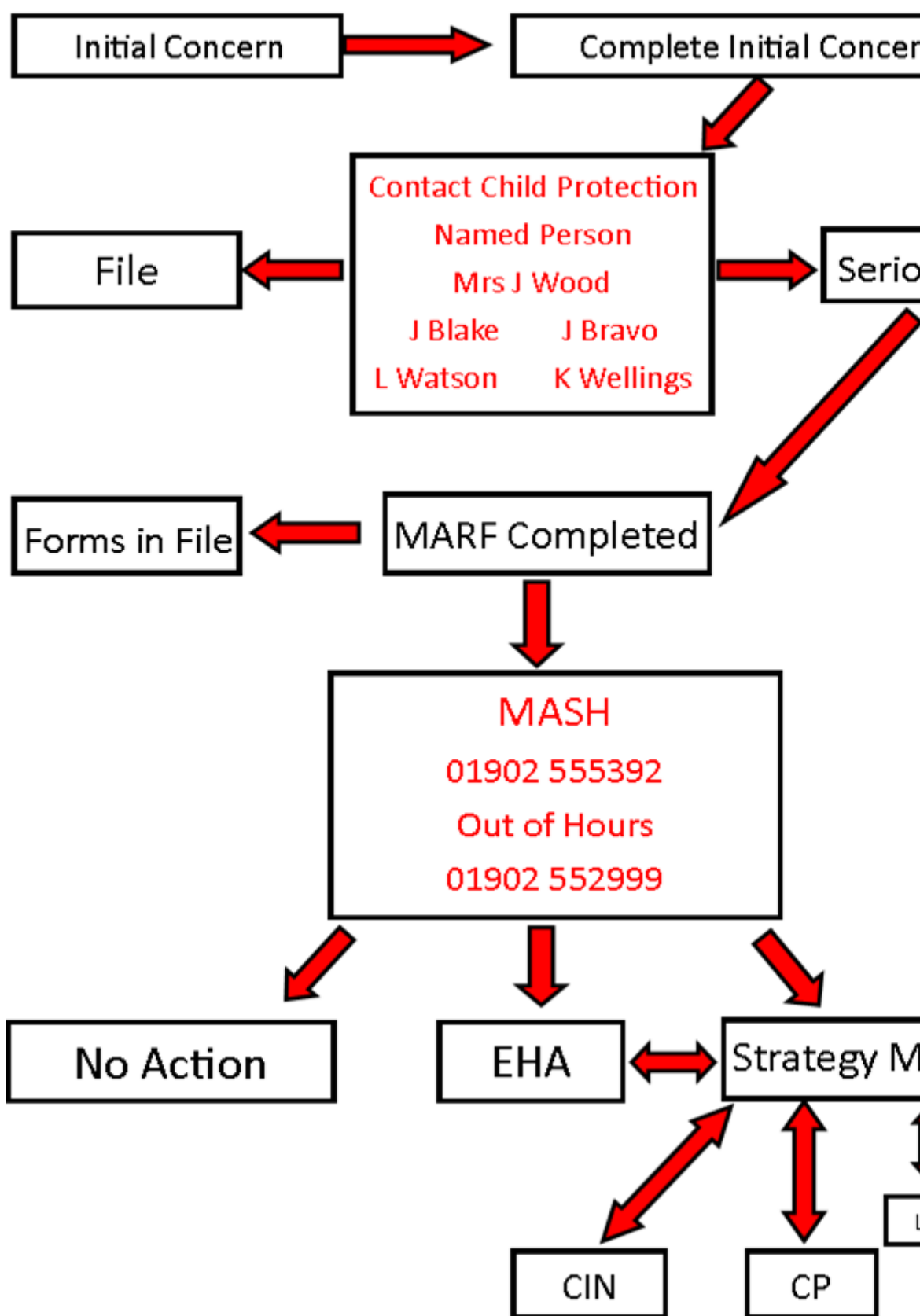
Body Map



Date:	Name of child:
DOB: / /	
Name of reporter:	Signature:
Witnesses:	



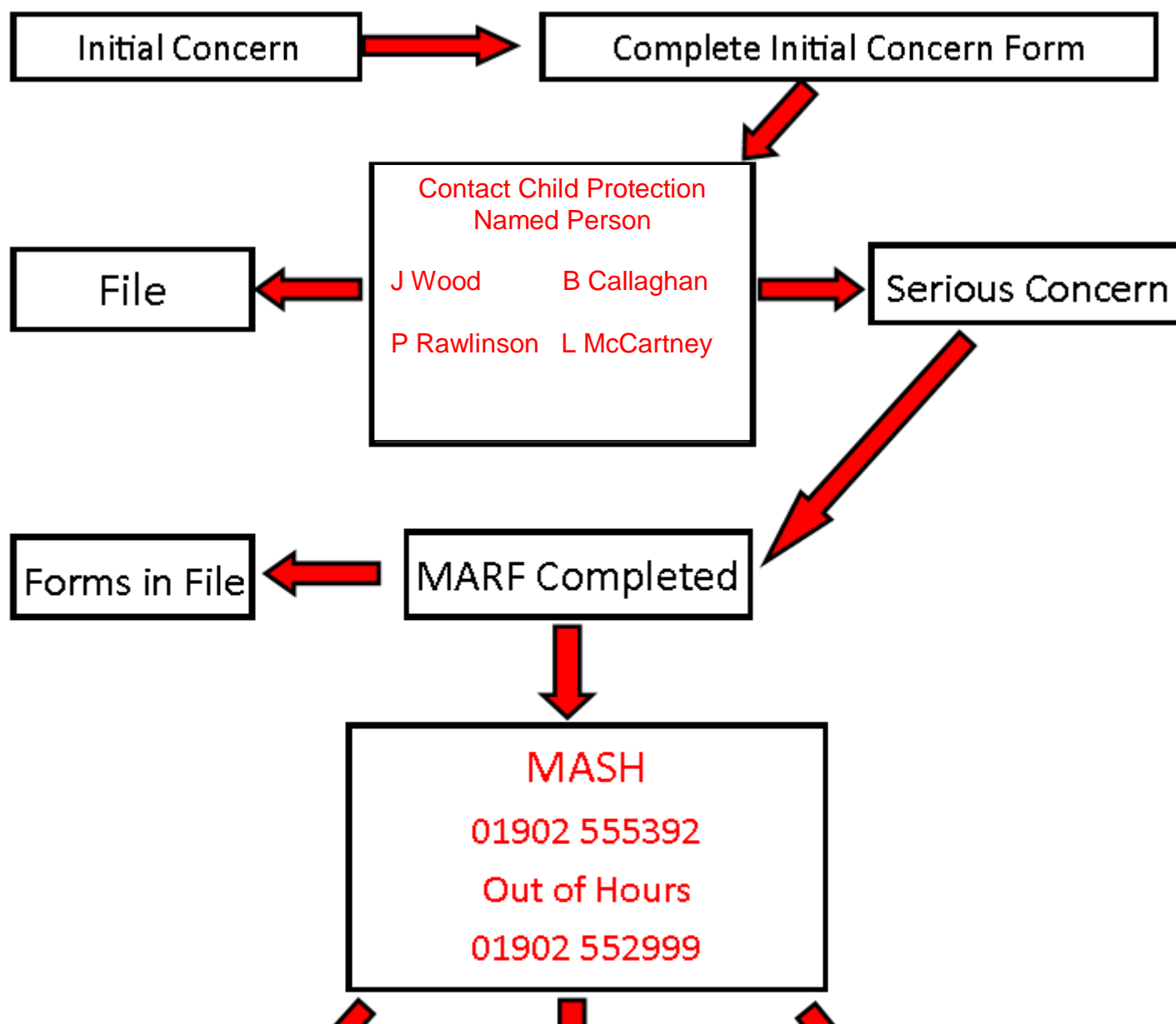
SAFEGUARDING



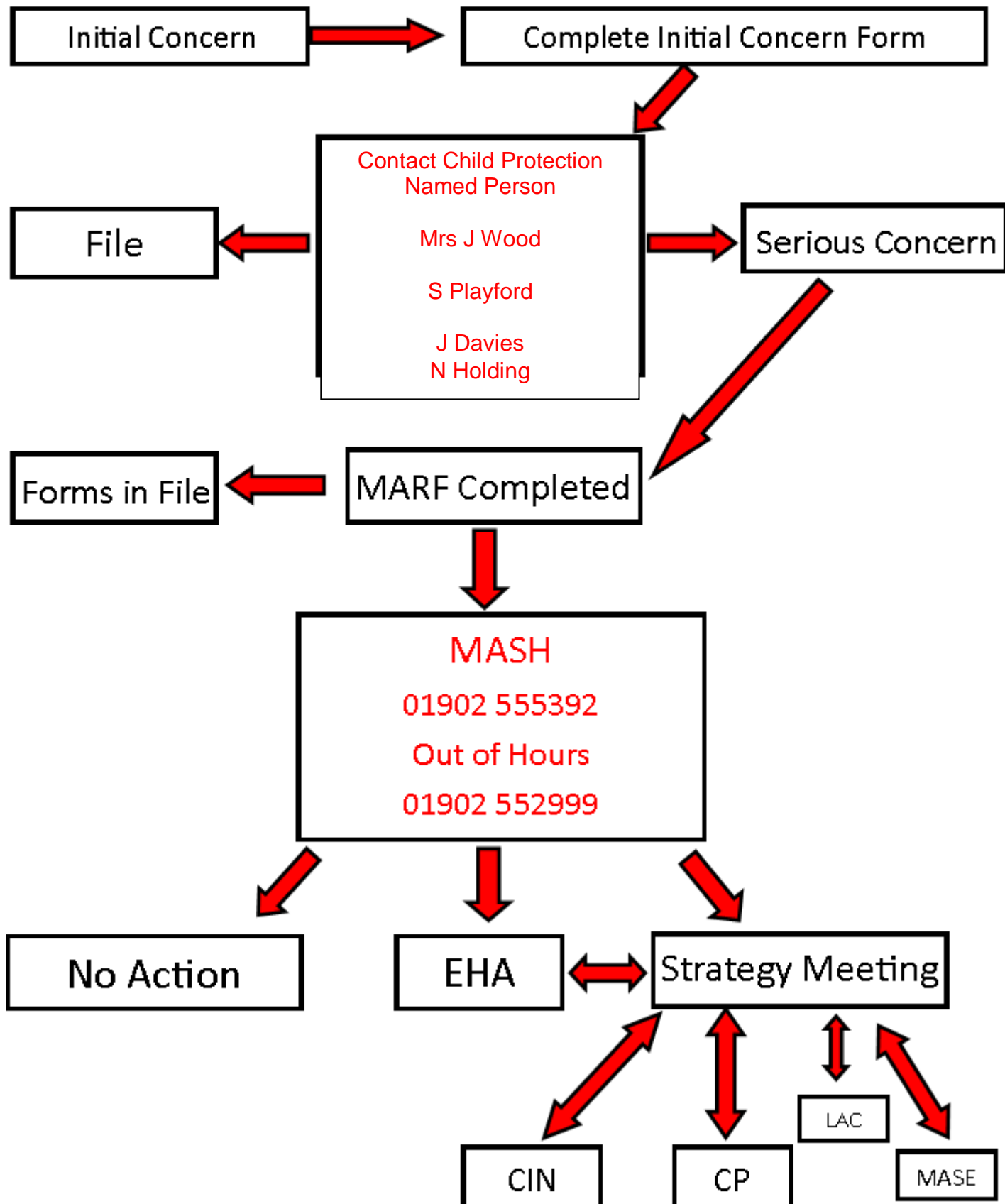
REMEMBER "It is not someone else's problem or job—Please follow



SAFEGUARDING

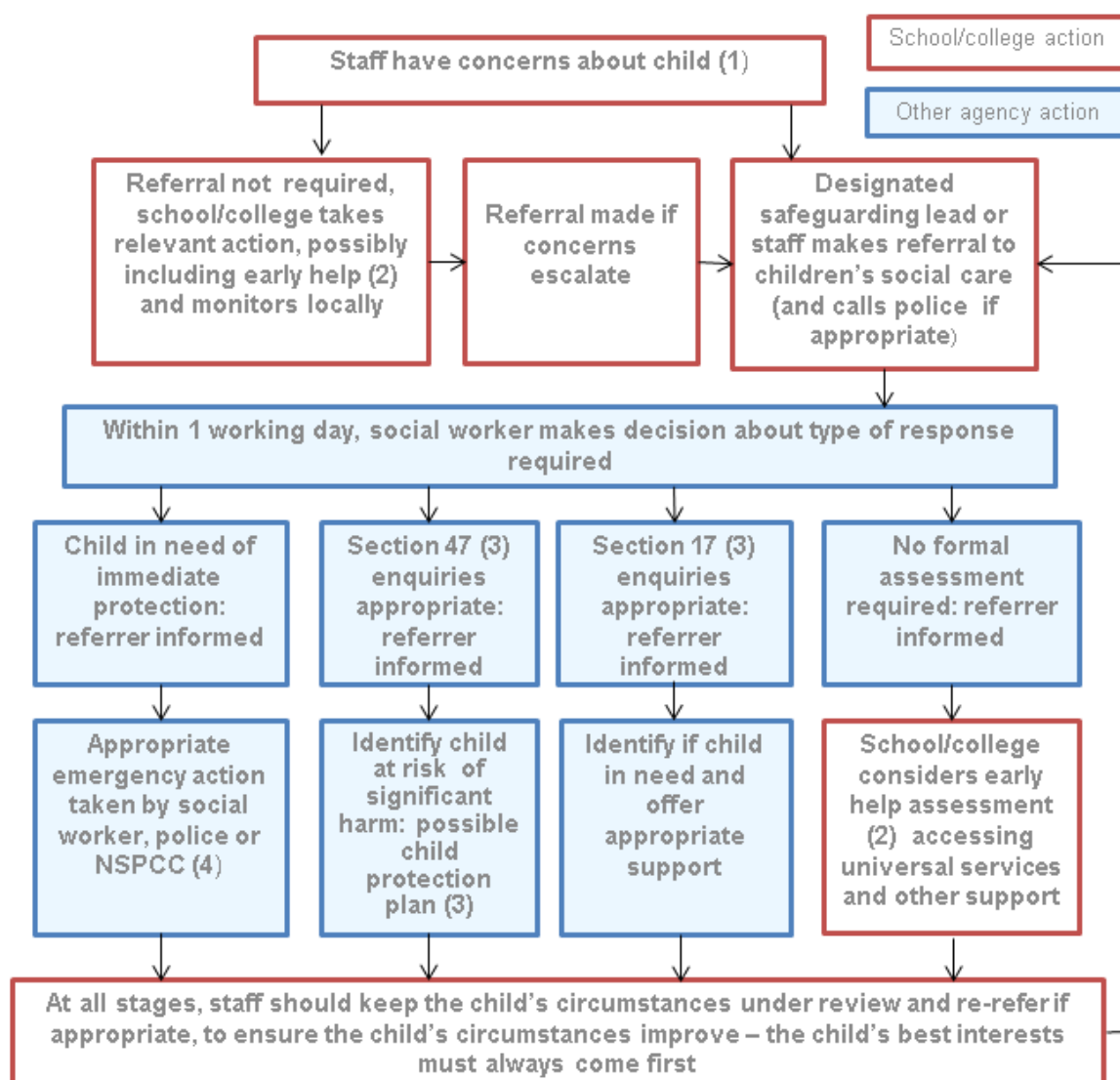


SAFEGUARDING



REMEMBER "It is not someone else's problem or job—Please follow procedures

Actions where there are concerns about a child



Appendix E – Updates from KCSiE

Sexting (Youth Produced Sexual Imagery)

At Lawnswood Campus we know and understand that sharing photos and videos online is part of daily life for many students, enabling them to share their experiences, connect with friends and record their lives. Photos and videos can be shared as text messages, email, posted on social media or increasingly via mobile messaging apps, such as Snapchat, WhatsApp or Facebook Messenger.

The increase in the speed and ease of sharing imagery has brought concerns about students producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation.

Although the production of such imagery will likely take place outside of our PRUs, these issues often manifest in schools and organisations working with children and young people. Our PRUs will respond swiftly and confidently to ensure that students are safeguarded, supported and educated.

Producing and sharing sexual images of under-18s is also illegal.

Lawnswood Campus PRUs will deal with all incidents of youth produced sexual imagery as a safeguarding concern. We will be guided by the principle of proportionality and our primary concern will be the welfare and protection of the students involved. Our PRUs may respond to incidents without involving the police in accordance with the guidelines set out in the UKCCIS - Sexting in schools and colleges: responding to incidents and safeguarding young people.

Lawnswood Campus will adopt the recommended procedures regarding the law and handling incidents outlined in UKCCIS- Sexting in schools and colleges: responding to incidents and safeguarding young people and DfE guidance – Searching, screening and confiscation (February 2014).

Whilst dealing with an incident our staff will:

- Respond immediately to disclosures or incidents in line with our PRUs' safeguarding procedures; staff will notify the Designated safeguarding Lead immediately of any concern, incident or disclosure
- Handle devices and imagery according to DfE advice (Searching, Screening and confiscation- Jan '18)
- Risk assess situations
- Involve other agencies, including escalation to the police and children's social care
- Record incidents
- Involve parents
- Seek to support students
- Support students to report youth produced sexual imagery online.
- Provide preventative education

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Effective information sharing between parents, settings, schools/colleges and the local authority is critical to ensure that all children are safe and receiving suitable education.

Staff at Lawnswood Campus PRUs are aware that a child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation.

Our staff adhere to and follow school procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions. Our staff are aware of the signs to look out for and the risks of potential safeguarding concerns such as travelling to conflict zones, FGM, CSE and forced marriage.

Our PRUs have appropriate safeguarding policies, procedures and responses for children who go missing from education.

Our PRUs have an admission register and an attendance register. All pupils are placed on these registers at the beginning of the first day on which the PRU has agreed, or been notified, that the pupil will attend our PRU. If the child fails to attend on the agreed or notified date, we will notify the host school and the local authority at the earliest possible opportunity to prevent the child from going missing.

Our attendance and admission registers are kept up to date. We actively encourage our parents and carers to inform us of any changes whenever they occur.

Our PRUs monitor attendance regularly and we address any issues that may cause concern and where attendance fails to meet the expected level.

Our PRUs will notify the local authority of any child who fails to attend school regularly or has been absent without the PRUs' permission for a continuous period of 10 school days or, more at such intervals as are agreed by the school and the local authority.

Where a parent notifies our PRUs that a pupil will live at another address, we will record in the admission register:

- the full name of the parent with whom the pupil will live;
- the new address; and
- the date from when it is expected the pupil will live at this address.

Where a parent of a pupil notifies our PRUs that the pupil is registered at another school or will be attending a different school in future, our school will record in the admission register:

- the name of the new school; and
- the date on which the pupil first attended or is due to start attending that school.

Our PRUs will notify the local authority **within five days** when a student's name is added to the admission register. We will provide the local authority with all the information held within the admission register about the pupil.

Our PRUs will also notify the local authority when a student's name is to be deleted from the admission register **under any of the fifteen grounds set out in the Education (Pupil Registration) (England) Regulations 2006 as amended, as soon as the ground for deletion is met and no later than the time at which the student's name is deleted from the register.**

Our PRUs will only delete a student's name from the admission register under regulation 8(1), sub-paragraph (f)(iii) or (h)(iii) if our school and the local authority have failed to establish the student's whereabouts after jointly making reasonable enquiries.

When our PRUs notify the local authority that a student's name is to be deleted from the admission register, our PRUs will provide the local authority with:

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

Our PRUs will work with the local authority to agree on methods of making returns. When making returns, our school will highlight to the local authority where we have been unable to obtain the necessary information from the parent, for example in cases where the child's destination school or address is unknown. Our PRUs will also consider whether it is appropriate to highlight any contextual information of a vulnerable child who is missing education, such as any safeguarding concerns.

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

Lawnswood Campus uses a secure internet system – school2school – we use this to transfer pupil information to another school when the child moves. As a maintained educational provider, we are required, when a pupil ceases to be registered at our school and becomes a registered pupil at another school in England or Wales, to send a Common Transfer File (CTF) to the new school. Lawnswood Campus complies with this requirement.

If a pupil arrives at our PRU and the previous school is unknown, we will contact the local authority for assistance.

Child Sexual Exploitation Update from KCSinE September 2018 (outlined in KCSiE 2016 Annex A – page 54)

The definition of child sexual exploitation is as follows:

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.

Like all forms of child sexual abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity; can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

At Lawnswood Campus we understand that any child in any community may be vulnerable to child exploitation, we will be alert to the fact that child sexual exploitation is complex and rarely presents in isolation of other needs and risks of harm (although this may not always be the case, particularly in relation to online abuse). Child sexual exploitation may be linked to other crimes and we will be mindful that a child who may present as being involved in criminal activity is actually being exploited.

At Lawnswood Campus we are aware that the following vulnerabilities are examples of the types of things children can experience that might make them more susceptible to child sexual exploitation:

- Having a prior experience of neglect, physical and/or sexual abuse;

- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

We understand that not all children and young people with these vulnerabilities will experience child sexual exploitation. **Child sexual exploitation can also occur without any of these vulnerabilities being present.**

Children rarely self-report child sexual exploitation so we understand it is vitally important that all staff at Lawnswood Campus are aware of the potential indicators of risk, including:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

We will remain open to the fact that child sexual exploitation can occur without any of these risk indicators being obviously present and be alert to the potential signs of abuse and neglect and to understand the procedures set out by local multi-agency safeguarding arrangements.

At Lawnswood Campus we will provide information and raise awareness of CSE including the signs, vulnerabilities and reporting procedures in line with MULTI-AGENCY PARTNERSHIP ARRANGEMENTS guidelines

Our staff will report any concerns regarding children at risk of CSE to the DSL or DDSL who will then make a referral and liaise with other relevant statutory agencies, for example, social care, police and health professionals as required

Wolverhampton CSE Co-ordinator is Sandeep Gill

The seven golden rules to sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Glossary

CP	Child Protection
CSE	Child Sexual Exploitation
CIN	Child In Need
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
EHA	Early Help Assessment
EHT	Executive Headteacher
FGM	Female Genital Mutilation
GDPR	General Data Protection Regulation
HBV	Honour Based Violence
KCSinE	Keeping Children Safe in Education
LA	Local Authority
LAC	Looked After Child
MARF	Multi-Agency Referral Form
MASE	Multi Agency for Sexual Exploitation
MASH	Multi-Agency Support Hub
MB	Management Board
PRU	Pupil Referral Unit
SEND	Special Educational Needs and Disabilities
SLT	Senior Leadership Team