



Title:	Safeguarding Policy
Internal Reference:	L4L-GY-001
Approved by:	Claire Bramley
Review Date:	1.8.23
Version No:	V4
Due for Review:	August 2024

Learning4Life-GY

Safeguarding & Child Protection Policy

Learning4Life-GY CIC is a DfE registered Independent School who's main projects have Service Level Agreements between L4L-GY and the Local Authority. Part of these agreements are to utilise the Local Authority internal policy's where practicably possible.

This policy has been updated with reference to the draft Statutory guidance for schools and colleges - Keeping Children Safe in Education (KCSIE) statutory guidance 2023 and North East Lincolnshire Council Safeguarding Children arrangements.

Introduction

Learning4Life-GY is based in the East Marsh of Grimsby and is a school for 13-19 year olds and an educational provision for adults, some of whom are particularly vulnerable by virtue of circumstance or disability. This policy addresses the principles underpinning practice and the safeguarding responsibilities of Learning4Life-GY senior leadership team, Governors, staff and volunteers. Throughout this policy reference is made to children and adults including vulnerable adults. The majority of learners are 13-19 year olds with occasional provision for adult project funded delivery.

The Learning4life-GY Safeguarding and Child Protection Policy is written to encompass the Keeping Children Safe in Education (KCSIE) Statutory Guidance for schools and colleges (DfE, 2023); the guidance set out in Working together to safeguard children (DfE, 2018); the statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002, the Education Regulations (2014), and the Non-Maintained Special Schools regulations 2015. As such it is mandatory for all staff within Learning4life-GY to understand their safeguarding responsibilities and follow the guidance as set out within Part 1 of the KCSIE (2023) Guidance.

The Pastoral/ Safeguarding Team

Designated Safeguarding Lead – Claire Bramley (Level 3 Designated Safeguarding Lead trained)

Deputy Designated Safeguarding Lead – Lauren Hallam (Level 3 Designated Safeguarding Lead trained)

Designated Teacher for Looked after Children – Claire Bramley

SEND Coordinator (SENCO) – Gwyneth Little

What is ‘safeguarding’?

Children:

With regard to children, Government guidance in Working Together to Safeguard Children 2018 defines safeguarding children and promoting their welfare as:

- Protecting children from maltreatment
- Preventing impairment of children’s mental and physical health or development
- Ensuring 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.

It is Learning4life-GY’s (L4L-GY) responsibility under these guidelines to engage with the wider safeguarding system because safeguarding and promoting the welfare of children is everyone’s responsibility.

Adults:

Regarding adults, safeguarding is defined in section 42 of the Care Act 2014. The care and support guidance accompanying the Act describes safeguarding adults as protecting an adult's right to live in safety, free from abuse and neglect. It involves people and organisations working together to prevent and stop both the risk and experience of abuse or neglect whilst ensuring that adult's wellbeing is promoted. This includes having regard to adults' views, wishes, feelings and beliefs in deciding any action, recognising that adults may have complex interpersonal relationships and may sometimes be ambivalent, unclear or unrealistic about their personal circumstances.

Who is this policy for?

It is for staff, volunteers, and learners working in L4L-GY, providing or delivering services to children or adults. Throughout this document, the word 'staff' applies to all those within L4L-GY regardless of employment or volunteer status. The word 'learner' applies to both children and adults unless stated otherwise. The words governing body refers to the governors and proprietors of Learning4life-GY. The governing body have a responsibility to ensure that all staff understand their safeguarding responsibilities in alignment with the KCSIE (2023) guidance. Learning4life-GY are also understanding of how staff and partners may encounter abuse or neglect through direct contact with learners e.g. through managing sports or community events or visiting people at home.

Whilst delivering education we are committed to ensuring that all children and vulnerable adults are protected and safe from harm by promoting the child's welfare. All staff therefore, have a responsibility to refer children (someone aged 0 to 18 years) or adults, either to North East Lincolnshire Councils Integrated Front Door under S11 of the Children Act 2004 or to the North East Lincolnshire Single Point of Access for adult social care under S42 - 46 of the Care Act 2014, if they believe or suspect that person:

- Has suffered harm caused by abuse or neglect;
- Is suffering abuse or neglect;
- Is likely to suffer harm from abuse or neglect or,
- Has a disability, developmental and or welfare needs that are likely to be unmet except through provision of support services (with agreement of the child's parent) under the Children Act 1989;
- In the case of adults, the adult in question appears to be suffering adverse effects of self-neglect (S42 -46 of the Care Act 2014)
- In the case of adult's self-neglect is causing harm or significant risk to others (S11 of the children Act 2004)

If any staff member has a concern about a child's welfare, they should act on them immediately; they should follow Learning4life-GY's Safeguarding referral process (ref. Page 9) and speak to the designated safeguarding lead or designated safeguarding officer.

The role of staff at Learning4life-GY

All staff have responsibility to provide a safe environment in which children can learn and will be prepared to identify children who may benefit from early help. Any staff who have concerns about a child's welfare will follow the processes identified within Appendix 1. Staff will support social workers and other agencies throughout any referral and be supported by the Designated Safeguarding Lead to carry out their duties. The Designated Safeguarding Lead will liaise closely with other services such as the local authority and children's social care. The Designated Safeguarding Lead will have a complete safeguarding picture and devise actions based on the response to safeguarding concerns.

A child centred and coordinated approach to safeguarding

Learning4life-GY recognise that all staff play an important part in the wider safeguarding system for children. This system is described in the statutory guidance as Working Together to Safeguard Children. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. As such, all staff at Learning4life-GY ensure that their approach is child-centred. This means that we consider, at all times, what is in the best interest of the child. No single practitioner can have a full picture of child's needs and circumstances. Learning4life-GY therefore recognise that everyone who comes into contact with children and families have a role to play in identifying concerns, sharing information and taking prompt action.

Children potentially at greater risk of harm

Whilst all children should be protected, it is important for Learning4life-GY to recognise that some groups of children, are potentially at greater risk of harm than others. We work with children and adults whose backgrounds or experiences; e.g. children who need a social worker (child in need and on child protection plans); children requiring mental health support; looked after children and previously looked after children all of which may make them vulnerable, so staff must be alert to potential risk and ensure that:

- All those accessing L4L-GY can feel valued, respected and able to discuss concerns they may have;
- Children's needs are paramount and the needs and wishes of children and vulnerable adults take priority so that individuals receive the support they need before problems escalate;
- Account is taken of the fact that children's and adults' life experiences and home circumstances can affect their ability to make appropriate lifestyle choices and can increase their vulnerabilities including adults' decisions in the context of the Mental Capacity Act.
- Those who are experiencing influence and coercive control can receive the support they need before difficulties escalate further.

L4L-GY is committed to supporting and protecting learners and in doing so acknowledges the need to:

- Recognise and manage risk in different situations and take appropriate action;
- Identify children who may benefit from early help.

- Provide a safe environment in which children can learn.
- Distinguish between contacts and interaction that are either acceptable or unacceptable and where coercive control and influence can threaten safety.
- Recognise when pressure from others, including peers, can threaten a learner's personal safety
- Assist learners to develop strategies such as assertiveness techniques to resist negative pressure
- Recognise that information sharing is vital for the effective identification, assessment and allocation of appropriate service provision, whether this be when problems first emerge, or where a child is already known to local authority children's social care (para 60 KCSIE, 2021).

Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. All staff at Learning4life-GY have the skills, knowledge and understanding to keep looked after children safe. In particular, appropriate staff (DSL, Deputy DSL and SENCO) have access to the information they need in relation to a child's looked after legal status and the child's contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When working with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group. The Designated Teacher (Designated Safeguarding Lead) will work with local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Children with special educational needs and disabilities or health issues

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Learning4life-GY recognise the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
 - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
 - communication barriers and difficulties in managing or reporting these challenges.
 - cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the Designated Safeguarding Lead (or Deputy DSL) and the SENCO

Indicators of abuse and neglect

Victims and alleged perpetrator (s): In places, Learning4life-GFY, use the term 'victims' as a widely recognised and understood term. However, we also recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in that way. We are conscious of managing any incident and are prepared to use any term with which the individual child is most comfortable. We also in places use the term 'alleged perpetrator(s)' and 'perpetrator(s)'. However, Learning4life-GY always think carefully about using this terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

Harm: Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relations to the impact on children of all forms of domestic abuse.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

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

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be aware of it and of their school or colleges policy and procedures for dealing with it,

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, 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.

Safeguarding issues

All staff will be aware of safeguarding issues that can put children at risk of harm. Behaviours linked to such issues as drug taking, alcohol abuse, deliberately missing education, sharing of nudes or semi-nude images/video and sexting (also known as youth produced sexual imagery), exploitation and child mental health put children in danger.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of 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 in exchange for something the victim wants or financial advantage or increased status. CSE does not always involve physical contact, it can also occur electronically. Learning4life-GY will ensure that CSE is dealt with through the same principles as sexual abuse.

Reports of child sexual exploitation are often complex and require difficult professional decisions to be made, we will ensure that our Designated Safeguarding Lead and Designated Safeguarding Officer are effectively trained and ensure that a calm and considered as well as appropriate response is made.

Child criminal exploitation: county lines

Criminal exploitation of children (CCE) 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, Learning4life-GY will ensure that in such cases where necessary a referral to the National Referral Mechanism is paced. Learning4life-GY will ensure that CCE is dealt with through the same principles as abuse and exploitation.

Child on child abuse

All staff should be aware that children can abuse other children (often referred to as child on child abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse they should speak to their designated safeguarding lead (or deputy). It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Learning4life-GY will ensure that any child on child abuse is dealt with through the Safeguarding procedure and in alignment with the Positive Behaviour Policy, Disciplinary Policy and Anti-bullying Policy.

Domestic abuse:

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

Serious violence:

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

Mental health:

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff at Learning4life-GY observe children on a day-to-day basis and will be able to identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Learning4life-GY staff will access a range of advice to help identify children in need of extra mental health support, including working with external agencies. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and in speaking to the Designated safeguarding lead.

Female Genital Mutilation (FGM):

All teachers will report to the police, if in the course of their work in the profession, they discover that an act of FGM appears to have been carried out on a girl under the age of 18. Contextual Safeguarding: All staff will consider the context within which safeguarding incidents and or behaviours occur. Consideration of environmental factors present in a child's life that are a threat to their safety will be considered as part of the referral process. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. Section 5B of the 2003 Act introduces mandatory duties for regulated health, social care professionals and teachers in England and Wales to report to police 'known' FGM cases for girls under 18 years old, identified in the course of their professional work. This duty has applied since 31 October 2015 onwards.

Section 5B of the 2003 Female Genital Mutilation Act places a mandatory reporting duty on regulated health and social care professionals and teachers in England and Wales requiring them to report 'known' cases of FGM in under 18s which they identify in the course of their professional duties, to the police.

In England and Wales, qualified teachers employed or engaged to carry out teaching work in schools and other institutions are required to report. The 2003 Act also provides for anonymity of victim and it is an offence to publish any matter that would be likely to lead members of the public to identify someone as the alleged victim of an offence under the Act (Section 4A and Schedule 1 of the Act). FGM Protection Orders (Section 5A and Part 2 of Schedule 2 of the Act) are civil orders to protect a girl at risk or protect a girl who has been subjected to FGM

The duty does not apply in relation to at risk or suspected cases or in cases where the woman is over 18. Reporting should take place when a regulated professional is informed by a girl under 18 that an act of FGM has been carried out on her or when the regulated professional observes physical signs that appear to show that an act of

FGM has been carried out on a girl under 18. The relevant age is the girl's age at the time of the disclosure/identification of FGM.

A report must be made to the police force in the area within which the girl resides. It is recommended that reports are made by calling 101. Police will record the information and initiate a multi-agency response. Staff at Learning4Life-GY deal with some of those who may be vulnerable and so should be aware of the policy and procedures for FGM under the Safeguarding Policy. Staff should know how to recognise risk, how to refer concerns if they arise and what their role may be in helping support learners at risk to prevent escalation of risk or harm. Staff should familiarise themselves with their responsibilities, referral processes and formats.

It is recommended that reports are made orally by **calling 101**, the single non-emergency number.

The system will determine your location and connect you to the police force covering that area. If you are calling with a report relating to an area outside the force area which you are calling from, you can ask to be directed to that force.

PREVENT, Radicalisation and Channel

Statutory Guidance issued in 2015, under Sections 36 to 41 of the Counter-Terrorism and Security Act (CT&S Act 2015) sets out duties for Local Authorities and partners to provide support for people vulnerable to being drawn into terrorism. In England and Wales this duty is the Channel programme. Section 26 of the CT&S Act 2015 places duty on certain bodies to exercise functions having 'due regard to the need to prevent people from being drawn into terrorism'. Channel is a key part of the Prevent strategy within the government's overall counter-terrorism strategy, CONTEST. The aim of Prevent is to reduce the threat of terrorism in the UK by stopping people becoming terrorists or supporting terrorism. Channel is a multi-agency approach to identifying and providing support to individuals who are at risk of being drawn into terrorism. For education providers and schools there is a duty to refer to Channel where there are concerns that a child or adult is at risk of becoming radicalised or involved in extremist behaviour. It is important to note that individuals need to consent to any support delivered through the Channel programme as directed in The Prevent duty: safeguarding learners vulnerable to radicalisation.

Staff at Learning4Life-GY are dealing with some of those who may be vulnerable for example learners who are unaccompanied asylum-seeking children and so should be aware of the policy and procedures for Prevent and Channel. Staff should know how to recognise risk, how to refer concerns if they arise and what their role may be in helping support learners at risk to prevent escalation of risk or harm. Staff should note that the Prevent programme is about supporting and protecting those most vulnerable, not about criminalising them. Staff should familiarise themselves with their responsibilities, referral processes and formats and consult the Prevent guidance located in the North East Lincolnshire Councils (NELC) Safeguarding Procedures and via links on the NELC website <https://www.safernel.co.uk/prevent-terrorism/>. Prevent training is available and all managers and safeguarding leads at Learning4life-GY access this as part of their induction and annual update training.

The Learning4life-GY curriculum is designed as such that Prevent, radicalisation and extremism are taught in sessions in PSHE and the Fundamental British Values are actively promoted throughout the entirety of the learner journey through displays,

guest speaks from the Police, role modelling of our whole school curriculum intent of Read, Respectful, Safe; visits and trips, and engagement with our own school democratic process through the School Council. The school recognises that proactive actions to develop the Fundamental British Values and open discussions about Prevent and the risks of radicalisation and extremism is of high importance. The risks associated are actively managed through the Curriculum, open discussion, training of staff and individual risk assessments undertaken by the Designated Safeguarding Lead if risks are heightened in any way.

A Prevent referral should only come via the safeguarding route via the Channel referral form, saved in the shared drive (safeguarding-Prevent folder) AFTER all existing safeguarding procedures have been completed (speaking with the person, staff members, parents) - if at the conclusion of existing safeguarding procedures it is still felt there is a vulnerability to radicalisation a Prevent referral should be sent through to Prevent@humberside.pnn.police.uk

Racist or inappropriate language on its own can be dealt with by the partner agencies as per normal policy unless it is thought that the influence is from exposure to extremist content online or there is some supporting evidence to show friends/family are influencing the child.

Local issues – Exploitation and Country Lines

It is recognised by the school that there are particular issues apparent within North East Lincolnshire in relation to child criminal exploitation and County Lines at present. Additional staff training in these particular areas will be a focus within the initial stages of the school year. Such local issues will also be discussed throughout the Curriculum to ensure that learners have the knowledge and skills of the risks associated with child criminal exploitation and will have the opportunity to attend Local Authority organised events to improve knowledge and skills. Curriculum within the PSHE classes and tutorials have dedicated focus upon such issues.

National Issues – Child on Child abuse

Ofsted's 2021 Review of Sexual Abuse in Schools and Colleges highlighted that such abuse can happen in or outside of the school as well as online and in response Learning4life-GY reinforce that a it could happen here approach is taken in all instances. Learning4life-Gy recognise the scale and impact of peer on peer abuse, and that non-recognition/ downplaying of the scale and scope can lead to a dangerous culture within the school. In response, Learning4life-GY will ensure that staff are vigilant and rather than waiting for a disclosure, will recognise that young people may not always want to make a direct report and that information may come from overheard conversations or behaviour changes. Learning4life-GY will take a zero-tolerance approach to child-on-child abuse. Again, additional training that is focused on this issue will be undertaken at the onset of the year and staff will be supported by the Safeguarding leads in referrals of this kind.

National issues - Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Learning4life-GY take a whole school approach to online safety and ensure that all learners are protected and educated in their use of technology. As such, effective mechanisms are in place to identify, intervene in, and escalate any concerns where appropriate in the same way as any other safeguarding

concerns are. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams

Filters and monitoring

Learning4life-GY will do all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, the governing body and Directors will ensure that an appropriate filter and monitoring system is in place and the effectiveness of this is regularly reviewed. The governing body, Senior Leadership Team (including the DSL) and all staff will have an awareness of the provisions in place and manage them effectively and know how to escalate concerns where identified (in following the child protection procedure. In addition, induction training for all staff will include a focus on expectations, roles and responsibilities around Learning4life-GY's filtering and monitoring system.

Reviewing online safety

Technology and the risks and harms related to it, evolve, and change rapidly. As such, Learning4life-GY will annually review our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our children face. Online safety and emerging themes will also be communicated to parents/ carers/ trusted adults so that a holistic approach to online safety is taken.

Training

All staff involved in service delivery or care of children & adults will be provided with the necessary support, guidance and training on awareness, recognition of signs and symptoms of abuse and how to respond to safeguarding or welfare concerns. All staff must attend safeguarding training accredited by the North East Lincolnshire Safeguarding Children Partnership (NELSCP) to promote learning that enables staff to deal with potential/actual harm and abuse. This will also ensure that L4L-GY continue to comply with the Children Act 2004, as amended by the Children and Social Work Act 2017 and Working Together 2018 Government Guidance. All staff and volunteers must undertake an e-learning package or attend levels 1 or 2 safeguarding courses and refresher training every three years. This will be supported with induction and annual training that continually updates staff awareness of L4L-GY school processes and systems which support safeguarding and online safety. The frequency of training will reflect the LSCB training requirements for training to be undertaken on a three yearly basis by staff and on a two-yearly basis by designated Child Protection officers.

Training provision for staff and volunteers will as a minimum cover the following core areas of safeguarding:

- Child Protection Policy
- Behaviour Policy
- Online Safety (including expectations, roles and responsibilities around filtering and monitoring systems)
- Staff Code of Conduct
- Safeguarding response for children who go missing from education
- The role of the designated safeguarding lead and officer
- Parental mental Health
- Domestic Violence
- Neglect
- Child exploitation
- Prevent
- Modern day slavery

The level of training undertaken by staff will be agreed by the Senior Leadership Team via discussion and supervision. As a minimum, all staff regularly working face-to-face with learners will undertake level 1 training. All managers will undertake level 2 and all other staff and volunteers should complete the e-learning package. Regardless of seniority or status, staff working with more vulnerable learners will be required to undertake Safeguarding Level 2 Adults training. This training will be regularly updated and staff will receive regular bulletins via email on any child protection and safeguarding updates as required.

Recruitment and vetting and Barring

References are always sought and where a reference appears incomplete, follow up phone calls made to further explore. All staff and the Chair of Governors working within L4L-GY will have a DBS. As an additional precaution, online searches for shortlisted candidates will be undertaken as part of due diligence in recruitment. Learnign4life-GY will inform candidates that online searches may be done as part of the recruitment process

Learning4life-GY is committed to safeguarding and promoting the welfare of children and vulnerable adults. Safer recruitment of staff is central to this commitment. We ensure that our recruitment policies and practices are robust, and that our selection procedures prevent unsuitable people from gaining access to children, young people and vulnerable adults. All adults who work with or on behalf of children and young people in these organisations must be competent, confident and safe to do so. We also understand the importance of ongoing vigilance that extends beyond the recruitment process. As such, all staff are to be supported to discuss matters they are worried may have safeguarding implications, including those that they may have seen or heard online.

All individuals working with learners at Learning4life-GY should be aware of and share the commitment to safeguard and in promoting the welfare of children, young people and vulnerable adults.

This commitment is expressed through the following requirements:

Recruitment:

Failure to adhere to the following requirements means that an applicant will not be successful in being recruited as a staff member at Learning4life-GY:

- Applicants for all relevant posts which involve work with children and young people or vulnerable adults will be required to undertake a DBS check if an offer of employment is made and will not be able to take up post until a satisfactory check has been received.
- Applicants are required, when completing an application for a post within these services, to supply full education and employment history since leaving secondary school, with explanations for any gaps.
- An applicant's personal commitment to safeguarding children, young people, or vulnerable adults will be explored through the interview process.
- Successful applicants must show proof of identity, qualifications, along with various other pre-employment clearances before a firm offer of employment is made.
- Prior to taking up post, applicants will be expected to sign the School's Code of Conduct, which commits them to upholding the highest standards in education, both in the way they undertake their professional duties, and in their personal conduct.

Employment:

Failure to adhere to the following requirements may result in dismissal.

- To participate in induction processes, professional supervision and annual appraisal, where the employee's ability to safeguard children, young people or vulnerable adults through professional involvement and personal conduct will be guided and assessed.
- To undertake mandatory training, including child protection as appropriate to their duties.
- To familiarise themselves with all relevant policies and procedures, produced by the school or by North East Lincolnshire Council, including procedures for managing allegations against staff.

Supervision:

Supervision is an essential component of safeguarding and enables supervisors and managers to assure themselves that staff are competent in safeguarding and practice is safe and effective in safeguarding learners and of sufficient quality to meet the required standards of L4L-GY. Supervision is used by line managers to ensure that safeguarding/vulnerability issues are identified and managed appropriately. It is also utilised to ensure the safety and wellbeing of staff involved in any Safeguarding referrals.

Listening and Responding to children, young people and adult learners .

Learning4life-GY Senior Leadership team and governors will ensure that there are suitable systems and means by which children can say what is happening to them and know that they will be heard. Learning4life-GY have a zero-tolerance approach, and even if there are no reported cases within the school, staff must not take the view that abuse and neglect does not happen within the school. All systems will operate with the best interests of the child at heart and empower learners to talk to adults that they trust. This will ensure that staff respond appropriately in the most effective way to keep learners safe. L4L-GY is committed to ensuring that we provide high quality professionals who are equipped to use professional judgement and analysis to put the learner's needs at the centre of all we do so that the right solution, at the right time can be found for each individual learner with the support for staff of training and supervision. L4L-GY will provide support and training aimed at:

- Recognising the signs and symptoms of abuse and neglect
- Being aware of the NELC Early Help process and understanding of their role within it.
- Making assessments of need and risk to inform appropriate referral processes alongside HM Government guidance 'What to do if you're worried a child is being abused.' (2015); and the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) so that they may follow a referral, along with the role they might be expected to play in such assessments
- Ensuring staff and volunteers are equipped and confident with regard to listening to learners, recording concerns, discussing the learner with other professionals and knowing how to make decisions, record them and be able to evidence the reasons for those decisions.

Recording, Decision-Making & Line Management Consultation

All staff and volunteers working with children and adults are accountable for case recording, making brief, accurate records of concerns and discussing these in a timely manner with the designated safeguarding lead. When recording disclosures or allegations of abuse by learners (or other referrers), staff should record these in the learner's words or those of the referral source. Safeguarding or child protection concerns that indicate immediate action is required to prevent or address harm, should be reported directly to the Local Authority's Integrated Front Door or adult safeguarding (**focus**) and to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. Where serious injury or harm requires urgent

medical or police intervention, staff should use their professional judgement and make a call to the relevant emergency services.

Allegations and safeguarding concerns about staff

If you have a safeguarding concern that is in relation to a staff member, please ensure that this referral is shared with the Principal and Designated Safeguarding Lead (Claire Bramley). The referral will then be dealt with according to the Safeguarding referral process as detailed below.

If you have a safeguarding concern in relation to the Principal, please ensure that this referral is sent to Claire Etheridge (Chair of Governors) at 07926035509 or Claire Etheridge <11claire.etheridge@gmail.com>

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated or unfounded/ unsubstantiated, Learning4life-GY will seek advice from the LADO and make any improvements required in school procedures to help prevent similar events in the future if any lessons can be learned and if improvements can be made.

Confidentiality & Information Sharing

In principle, matters relating to individual learners and child protection are confidential. The Designated Safeguarding Lead or Deputy DSL however may be obliged to disclose information about a learner to other staff or partners, but this will be done on a 'need to know' basis. All staff have a professional duty to share information with other agencies in order to safeguard children and so must never make promises to learners to keep secrets. All Safeguarding concerns are logged on the L4L-GY CPOMs, this is password protected and only accessible to the Designated Safeguarding Lead and Officer. Where a child is transitioning to an alternative Educational provider a Summary of the Safeguarding key notes (as a time line) will be provided within 5 working days to the new provider using CPOMs. If a child does not transition to an alternative educational provider, L4L-GY will keep the information for 35 years.

All staff and volunteers should share safeguarding information in a timely way to avoid unnecessary delay, particularly where matters could escalate if not addressed swiftly.

L4L-GY staff and volunteers are in a prime position to develop trusting relationships with learners. This may sometimes lead to identifying problems within family units or home circumstances that could benefit from additional support. In such cases staff should consider with their manager whether an Early Help Assessment should be completed or if Local Authority intervention is required.

The role of the school Governors

It is the responsibility of the Scrutiny Panel (and all governors therein) to monitor and review the implementation of the Safeguarding Policy. It is also the role of the governing body to have strategic leadership responsibility for the school's safeguarding arrangements and to undertake up to date Safeguarding Level 1 and KCSIE update CPD (this includes mandatory reading of Annex C of the KCSIE guidance. It is also the Governors responsibility to ensure that online safety is a running and inter-related theme in any safeguarding monitoring and includes ensuring that filtering and monitoring are effective. It is the Principals role to ensure

that staff understand and follow policies and procedures agreed by the governing body. The expectation is that a whole school approach to Safeguarding is inherent and that safeguarding, and child protection underpin all relevant policy and processes. A regular report will be provided to the Scrutiny Panel at each meeting which will evaluate Safeguarding concerns, referrals and resolutions in alignment with GDPR (in terms of personal details being redacted). Such an approach will enable the effective monitoring of the Policy success.

Concerns, Assessment & Referral

Safeguarding concerns may come to staff's attention through a variety of sources and may include issues that meet the threshold and those that do not meet the threshold of harm such as:

- Actual disclosure of abuse/physical harm
- An individual's behaviour placing the young person him/herself at risk
- A learner becoming homeless
- Behaviour and presentation indicative of substance or alcohol misuse
- Children or vulnerable adult's presentation indicating neglect or untreated illness
- Self-harming behaviours or overt and negative behavioural changes
- Parental behaviours that affect children and young people such as domestic abuse
- Indications of mental health problems or deteriorating mental health conditions

The Principal and/or Deputy Designated Safeguarding Lead who having assessed the information, will advise on next steps i.e. whether or not a safeguarding referral is needed or early help assessment commenced.

Should the issue relate to a part time learner aged 13-16, the designated safeguarding lead will report to the dual registered School's Child Protection Officer, making record in CPOMs and associated files.

Low-level concerns

Low level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the school; or as a result of vetting checks undertaken. All low level concerns should be noted on CPOMs and the Safeguarding Leads assigned to make decisions in terms of actions (see Annex 1 for Safeguarding referral policy which includes all concerns). This will ensure that low level concerns are shared appropriately and confidentially with the correct people within the organisation. The Principal is the ultimate decision maker when it comes to low level concerns.

The Early Help Assessment Process

When a staff member or volunteer identifies additional needs for a child or young person that give rise to low level concerns that are not deemed to be safeguarding but it is felt cannot be addressed by L4L-GY alone, then the early help assessment process should be commenced. This will then be used in conjunction with the Family

Support Pathway threshold of Need and child concern model. The pathway for this can be found at <http://www.safernel.co.uk/>.

Child Protection or Child in need

If a decision is made to make a safeguarding referral and the child does not have an allocated social worker, the concerns should be reported to the Local Authority's Front Door. Referrals should be made on the *same working day* as the concern is noted but within a *maximum of 48 hours*. If the learner has a named social worker, that worker or their supervisor must be contacted and information passed on. Where information comes to light outside of normal working hours or at weekends/bank holidays, information should be referred to the emergency out of hours service on: **01472 326292 option 2.**

When making referrals to Children's Social Care; pre-existing assessments e.g. early help assessments should be included. Other known information such as developmental needs, parenting capacity, information on relevant others, significant events, and context or wider family and environment should also be shared. In all cases a Multi-Agency Referral Form (MARF) will be completed and sent to NELCChildrensFrontDoor@nelincs.gov.uk. The MARF is accessible at safernel.co.uk/staying-safe-and-prevention-early-int

If the concern relates to Child Sexual exploitation or Criminal Exploitation, the following processes should be followed

- Completion of the Child Criminal Exploitation Risk Assessment Matrix
- Completion Exploitation Tool

After completion of the Child Criminal Exploitation Risk Assessment Matrix, the Risk Assessment should be submitted to NELCChildrensFrontDoor@nelincs.gov.uk

If the concern relates to modern day slavery, the modern day slavery referral tool will be undertaken which is accessed at modernslavery.gov.uk/start.

If a child or young person is at immediate risk

- 999 should be called where there are immediate concerns
- 101 to obtain assistance and advise if not an emergency

To support staff undertaking a referral for service please access the attached link and follow the manual.

<http://www.safernel.co.uk/>

The Children's Assessment and Safeguarding Service/Out of Hours Service can be contacted at:

The Civic Offices, Knoll Street; Cleethorpes; North East Lincolnshire; DN35 8LN
Telephone: (01472) 326292: Option 2; or **Fax No:** 01472 325403; or
E-mail: NELCChildrensFrontDoor@nelincs.gov.uk

Safeguarding Adults

L4L-GY and its partners, including the Local Authority will fulfil their respective duties under the Care Act 2014. <http://www.focusadultsocialwork.co.uk/single-point-of-access/report-neglect-or-abuse/>

What type of concern should be reported?

In safeguarding and promoting the welfare of adults, L4L-GY will ensure its safeguarding practice reflects the 6 key principles of the Care Act as outlined below:

- Empowerment: encouraging adults to make their own decisions and give informed consent
- Prevention: better to take action before harm occurs and recognise signs and know how to act
- Proportionality: taking the least intrusive response appropriate to level of risk and need
- Protection: supporting, representing & helping people to get the help they need to stay safe
- Partnership: working together with the adult and other professionals to get the best outcome
- Accountability: ensuring adults know who is involved and their roles are in protecting them

What Types of Abuse or Neglect Cause Harm to Adults?

Some aspects of adult safeguarding differ from those for children simply because adults have differing degrees of independence affecting their rights and responsibilities. This particularly applies to adults making decisions on their own behalf and having a right to consent or refuse enquiries or interventions being made on their behalf. However, harm caused by abuse and neglect to adults in some respects is no different to that suffered by children. It includes:

Physical abuse:

Assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions.

Domestic abuse and sexual violence:

Including psychological or emotional harm, physical assault, sexual abuse, financial abuse, and so called 'honour' based violence.

Sexual abuse:

Rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure, sexual assault and sexual acts to which the adult has not consented or was pressured into consenting to.

Psychological/emotional abuse:

Treats of harm or abandonment, deprivation of liberty or deprivation of contact to others, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation, unreasonable and unjustified withdrawal of services or supportive networks.

Neglect and acts of omission:

Ignoring medical needs, health conditions, emotional or physical care needs; failure to provide access to appropriate health, care and support or educational services; withholding of the necessities of life, such as medication, clothing, food, heating & hygiene facilities.

Adult Specific Safeguarding Factors

Chapter 14 of the Care Act Guidance (revised 2016) identifies harm specifically affecting vulnerable adults including:

Financial or material abuse:

Theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, misuse or misappropriation of property, possessions or benefits,

Modern slavery encompassing:

Slavery, human trafficking, forced labour and domestic servitude.

Discriminatory abuse:

Harassment, slurs or similar treatment because of race; gender and gender identity, age, disability, sexual orientation, religion.

Organisational abuse:

This includes abuse in residential establishments or care homes where the regime is abusive and this can be to more than one person.

Self-neglect:

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. Self-neglect in itself may be a source of harm to an adult but may not be a safeguarding issue or prompt a section 42 enquiry unless it is firmly believed that the learner lacks ability to protect themselves by controlling their own behaviour.

Raising a concern

Safeguarding concerns should be raised for any incident where staff recognises one or more factors that may indicate harm or abuse as outlined above, or there is disclosure of alleged abuse made by a learner or their representative (as outlined in Section 42 of the Care Act 2014, and the Care and Support Guidance Oct 2014

Suspected abuse, harm and neglect may vary in seriousness and nature ranging from and including physical harm, negative outcomes for health and wellbeing, adverse effects on a learner's psychological well-being, or financial circumstances. Where emergency or urgent action is required to secure a learner's health and well-being, – the appropriate emergency services (i.e.

Ambulance, Police, should be contacted followed by a telephone call to the NELC Front Door 01472 256256.

N.B. other notifications may also be made to the Care Quality Commission (CQC) for registered providers, and where appropriate, the Health and Safety Executive in line with registration, licencing or legislative requirements. Advice will be given by the SPA and **focus** where this is appropriate.

What action will be taken following raising a concern?

Safeguarding concerns referred to the SPA will be passed to Safeguarding Adults Practitioners on duty (office hours only). The information will be reviewed and assessed to determine the level of risk and the appropriate and proportionate response. If required, further contact may be made with L4L-GY or other key persons for further information before a decision is made on next steps.

It will be the duty social worker/safeguarding practitioner who will make the decision on the most proportionate response based on assessed risk and need.

The Safeguarding team will notify the referrer of the outcome of the referral but may only be authorised to share very limited details. The safeguarding adults business team may be contacted to ascertain the outcome of any past enquiries or regarding the progress or to provide further information to inform any current safeguarding enquiries on **01472 256256**.

If following a referral the concerns persist, further contact should be made with the SPA and a new referral made. If the concern requires urgent action, this should be emphasised and made clear when contacting the SPA. If emergency services are required, these should be contacted prior to making the safeguarding referral.

Decisions to refer adult safeguarding concerns

If any doubt remains or advice is needed please contact the Adult Social Care Single Point of Access (SPA) on 01472 256256 (24hrs), to discuss your concerns. Safeguarding concerns can be referred by contacting **focus independent adult social work** via the single point of access on: **Single Point of Access (24hrs) – 01472 256256/ focus@nhs.net**

Raising Safeguarding Adults Concerns with the NEL Safeguarding Adults Team (*focus*)

Please note: If concerns require immediate or urgent action, the appropriate emergency services (i.e. ambulance, Police, etc.) should be contacted prior to making a referral regarding safeguarding concerns. Whilst the main route for raising a concern is by phone to the SPA, there still may be occasions where you are required to put your concerns in writing, e.g. where the name of the adult at risk is not known, or where there are multiple individuals at risk, for example 'All

residents at care home X, or *'All users of service Y'*. Written referrals should be emailed to the Safeguarding Adults Team secure inbox:
focus.safeguardingadultsreferrals@nhs.net

Please note that this email account is checked within normal office hours only
****Mon – Fri 08.30 – 17.00****.

If advice is needed regarding any safeguarding action that may be needed, contact should be made with: Adults Social Care Single Point of Access (ACS SPA) **01472 256256** at any time 24/7.

Concern & Conflict Escalation Procedure

Both LSCB and SAB guidance and procedures acknowledge that on occasions – professional views of risk may differ and the decisions made following referrals will not always appear to be sufficient to the referrer. Where concerns persist and any professional believes that someone remains at risk – the escalation procedures should be consulted and where appropriate followed. Staff using this procedure should always record when, why and by whom decisions were made and record clearly when escalation procedures have been followed.

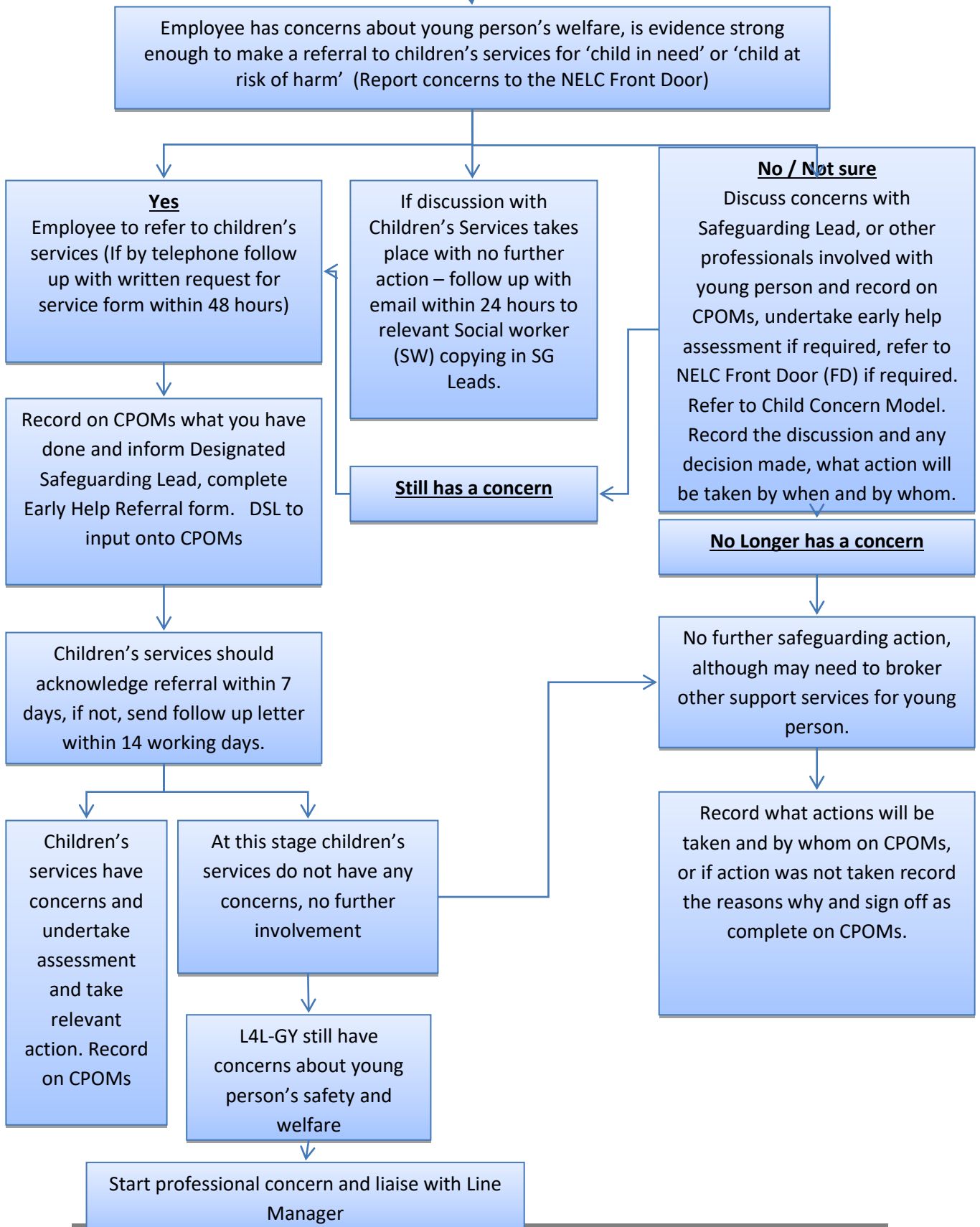
<http://www.safernel.co.uk/information-for-practitioners/>

Contact Details for Adult Social Care

<http://www.focusadultsocialwork.co.uk/single-point-of-access/report-neglect-or-abuse/>

ANNEX 1:

**Child Protection Procedures:
Safeguarding Concern**



ANNEX 2: ALLEGATION MANAGEMENT PROCEDURE

Concerns about a member of staff or volunteer working with children	If a professional receives an allegation or has a concern about the behaviour of a member of staff working or volunteering with children and that concern could amount to: <ul style="list-style-type: none"> a. A member of staff or volunteer has behaved in a way that has harmed a child, or may have harmed a child, or b. Possibly committed a criminal offence against or related to a child, or c. Behaved towards a child or children in a way that indicates s/he may pose a risk of harm to children. Then the professional should:
Report their concern	Report the concern to the most senior person not implicated in the allegation. In the first instance this would be the Principal or CEO/Director however if these individuals are implicated in the allegation this would be the Chair of Governors.
Completion of written record	The senior person must complete a written record of the nature and circumstances surrounding the concern, including any previous concerns and where the concern came from and brief details
Seek advice before proceeding – initial discussion	The senior person always contacts the Local Authority Designated Officer (LADO) for advice prior to investigation of the allegation. All referrals of this kind must be discussed by telephoning the professionals consultation line is 01472 323145 . This call will be answered by a Senior Social Worker in the Front Door team where your query will be discussed. The LADO will offer advice on any immediate action required and assist with employment and safeguarding issues.
Allegations management Process	If, after the initial discussion with the LADO, it is agreed that the allegation meets the criteria, the LADO will review the referral and convene an allegations management meeting. This might result in a criminal investigation, a Social Care investigation and/or an investigation to inform whether disciplinary action is required. If it is agreed that the allegation does not meet the criteria, the LADO will record the initial discussion and send it to the Directors for records. Any further action will be taken within the school if necessary (in alignment with the Staff Code of Conduct)
Further Action	Further meetings may be required and these will be convened with the LADO, with Learning4life-GY input at all times. Further guidance on the allegations management process can be found in the Keeping Children Safe in Education 2020 guidance (page 58/59) https://www.safernel.co.uk/information-for-practitioners/safeguarding-children/

