

Safeguarding and Child Protection Policy (2021/22)



Contents:

1. Statement of intent
2. About our policies
3. Definitions and emerging risks
4. Important contact details
5. What to do if you have a safeguarding concern
6. Recruitment, training, and specific responsibilities
7. Improving awareness and safeguarding skills
8. Providing students and staff with a safe environment
9. Vulnerability of students with additional needs
10. A whole-school approach to supporting students
11. Signs of abuse
12. How we interact with other agencies
13. Information sharing and record-keeping
14. Specific safeguarding issues
 15. Physical abuse
 16. Emotional abuse
 17. Sexual abuse
 18. Neglect
 19. Online safety
 20. Peer on peer abuse
 21. Children with additional vulnerabilities
 22. Child Sexual Exploitation (CSE)
 23. Child Criminal Exploitation
 24. County Lines
 25. Radicalisation, Extremism and Terrorism
 26. Domestic Abuse
 27. Sexting
 28. Fabrication and Inducement (FII)
 29. Denial of medical need
 30. Honour-Based Violence
 31. Female Genital Mutilation
 32. Breast Ironing
 33. Forced Marriage
 34. Children Missing Education
 35. Modern Slavery
 36. Private Fostering
 37. Homelessness
 38. Looked after children and previously looked after children
 39. Mental Health

Appendix 1 – Logging a concern about a child’s safety and welfare

Appendix 2 – Designated Safeguarding Lead – Job Description

1. Statement of intent

Lokrum Fields fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children and vulnerable adults. These responsibilities

Safeguarding and Child Protection Policy (2021/22)



apply to all staff (including any supply staff), governors and volunteers who are involved in any way with the school.

Clinicians and other professionals who engage with students at Lokrum Fields are required to adhere to our safeguarding policy.

We raise awareness of safeguarding through our safer recruitment procedures and staff training and through the provision of information at our premises, on our website, in updates for parents and through curriculum delivery.

Safeguarding is embedded across our operations and is always considered in the risk assessments for extended school activities.

2. About our policies

- 2.1. Our policies have been developed to comply with all relevant legislation and associated guidance. Policies will be updated periodically as necessary.
- 2.2. Our policies are inter-related and are intended to be read, understood, and used collectively.
- 2.3. All staff and governors are expected to be familiar with and abide by our policies.
- 2.4. By accepting and maintaining a placement for their child at Lokrum Fields, parents agree to support the ethos and policies. Parents are able to access these documents via the website, or by emailing the Office Manager.
- 2.5. The Office Manager is responsible for ensuring volunteers and visitors are familiar with any policies which are relevant to their involvement and for taking reasonable steps to ensure compliance.
- 2.6. The Headteacher is responsible for ensuring policies are implemented fairly, effectively, and consistently.
- 2.7. The Headteacher is responsible for identifying any training needs in relation to our policies. The Office Manager is responsible for arranging the required training. All staff are expected to engage in continuous learning and ongoing training appropriate to their roles.
- 2.8. The effectiveness of our policies and their implementation is monitored by the Governing Body. Unless otherwise stated, the Governing Body reviews each policy annually.
- 2.9. The Governing Body for Lokrum Fields is provided by Governing for Ambition, an independent community interest company. The Governing Body uses its expertise to monitor the performance of Lokrum Fields and to advise the Proprietor of any recommended actions. Responsibilities assigned to the Governing Body are limited to these advisory and accountability functions.

Safeguarding and Child Protection Policy (2021/22)



- 2.10. Lokrum Fields is owned by Wider Ambition Ltd, a subsidiary of Wider Plan Ltd. References to the Proprietor mean a Director of Lokrum Fields or a senior representative from Wider Plan with delegated authority.
- 2.11. The Lokrum Fields Senior Leadership Team (SLT) includes the Headteacher, Proprietor, Pastoral Lead, and any member of staff to whom responsibility is temporarily delegated by the Headteacher or Proprietor.
- 2.12. All references to parents within our policies should be interpreted to include parent carers.

3. Definitions and emerging risks

- 3.1. Safeguarding and promoting the welfare of students includes:
 - 3.1.1. Protecting students from maltreatment
 - 3.1.2. Preventing impairment of students' mental and physical health or development
 - 3.1.3. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - 3.1.4. Taking action to enable all children to have the best outcomes
- 3.2. Abuse means the maltreatment of a child by inflicting harm or by failing to act to prevent harm. The four main categories are physical, sexual and emotional abuse and neglect. Abuse may occur in any location, online or offline. It may be perpetrated by individuals or groups and by adults or children.
- 3.3. References in this policy to staff will generally also apply to governors, volunteers, clinicians and other professionals who engage with students at Lokrum Fields.
- 3.4. References in this policy to a child or student will generally also apply to any adult who is the subject of a safeguarding referral.
- 3.5. References in this policy to the Designated Safeguarding Lead (DSL) will apply in the absence of the DSL to the Deputy Safeguarding Lead or most senior members of staff available.
- 3.6. We regularly review safeguarding updates, including updates to legislation, statutory guidance and local policy. Staff are kept informed of best practice on a continuous basis. Our safeguarding policy is reviewed at least annually. Interim reviews will occur following any significant incident or legislative update.
- 3.7. Safeguarding is an extensive area and new risks emerge in line with societal trends. Risks are defined, explained and updated within our training materials.

4. Important contact details

Safeguarding and Child Protection Policy (2021/22)



- 4.1. Contact details for key staff and contacts in other agencies with responsibility for safeguarding are published in the safeguarding statement on our website and updated regularly when contact details change.
- 4.2. The Designated Safeguarding Lead is:

Alison Prosser (Acting Head of Lokrum Fields and Pastoral Lead)
alison.prosser@widerambition.org
- 4.3. The Deputy Safeguarding Lead is:
Paula Sprigg (Headteacher, Chestnut Place)
paula.sprigg@widerambition.org
- 4.4. The Safeguarding Governor is:

Lynn Evans (Chair of Governors)
lynn.evans@widerambition.org
- 4.5. The Designated Safeguarding Leads and Safeguarding Governor can also be contacted on 01905 349915.
- 4.6. The Local Authority Designated Officer (LADO) for Worcestershire:

LADO@worcestershire.gov.uk
- 4.7. A number of Local Authorities place students at Lokrum Fields. Local safeguarding procedures and points of contact, including the relevant Family Front Door, can be accessed at:

<https://westmidlands.procedures.org.uk>
<https://www.proceduresonline.com/swcpp/gloucestershire/contacts.html>

5. What to do if you have a safeguarding concern

- 5.1. All staff have an individual responsibility to act on their concerns and to act in the best interests of the child.
- 5.2. We promote an attitude that each incident may be the “one chance” to protect a child. Every concern should be reported and should not be dismissed as insignificant.
- 5.3. In some cases, an accumulation of reported concerns, each of which may individually seem to be minor, will provide vital evidence of abuse.
- 5.4. All safeguarding concerns must be reported promptly, using CPOMS wherever possible and otherwise using the Lokrum Fields Safeguarding Concern Form. Although CPOMS will notify the DSL of any updates, it remains the responsibility of the person reporting the concern to also contact the DSL to ensure the concern has been received.

Safeguarding and Child Protection Policy (2021/22)



- 5.5. All conversations and correspondence relating to a safeguarding concern must be documented promptly, using CPOMS wherever appropriate. All safeguarding reports and updates must be entered on to CPOMS as appropriate and as soon as practicable, before the relevant members of staff leave for the day.
- 5.6. Allegations involving a member of staff (including supply staff) or volunteer will be reported to the Local Area Designated Officer (LADO), any involved supply agency, and Wider Ambition HR as appropriate, under the procedures detailed in our Allegations of Abuse Against Staff Policy. CPOMS will not be used to record the detail of any allegations made against staff; instead, the detail will be held in the relevant personnel file. An anonymised reference will be added to the student's file on CPOMS.
- 5.7. Any staff receiving a disclosure of abuse, or noticing signs of possible abuse, should record the concern on CPOMS or make detailed notes, as appropriate, as soon as possible (and ideally within an hour), writing down exactly what was said and using the student's own words as far as possible. Any comments or additions made by the member of staff should be clearly identifiable. All notes should be timed, dated and signed, with the adult's name printed alongside the signature.
- 5.8. Members of staff involved in safeguarding procedures will reassure victims that they are being taken seriously and that they will be supported and kept safe. No victim will be given the impression that they are causing a problem by reporting abuse, sexual violence or sexual harassment.
- 5.9. Staff are not responsible for investigating welfare concerns or determining the truth of any allegation or disclosure. However, if staff have information which could be relevant to such an investigation by an external agency, they should share this information when raising their concern.
- 5.10. Any staff who receive a disclosure of abuse or suspect that a student is or may be at risk of harm should report it immediately to the Designated Safeguarding Lead or Deputy DSL. CPOMS should be used wherever feasible and appropriate.
- 5.11. Staff may report concerns directly to Children's Services or the police if they consider that this is necessary in order to ensure the student's safety. They should immediately inform the Designated Safeguarding Lead that they have taken such action, unless advised otherwise by the authorities.
- 5.12. Following receipt of any concern, the DSL will consider what action to take, having due regard to the guidance in this policy in relation to specific areas of risk. Any advice provided by Children's Services will be given appropriate weight. All information and actions taken, including the reasons for any decisions made, will be fully documented.
- 5.13. The DSL should ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. This includes a responsibility to provide the student with suitable opportunities to express their views and give feedback.

- 5.14. The DSL should always undertake appropriate discussion with a parent prior to involving another agency (or, if an agency has been contacted in an emergency, as soon as possible) unless doing so could reasonably be expected to lead to adverse consequences for the child, place anyone at risk of harm, contravene the child's wishes or impede a criminal investigation. If a decision is taken not to contact the child's parents, extra care will be taken to ensure that all circumstances have been taken into account, including the child's rights, and that their safety is the overriding factor.
- 5.15. A referral will always be made to Children's Services or the police if a child is considered to be at risk of immediate serious harm.
- 5.16. If staff have ongoing concern about a child, they should repeatedly raise their concern with the DSL. If they are not satisfied that their concerns have been responded to appropriately and in accordance with the procedures outlined in this policy, they should raise their concerns with the Proprietor and the Chair of Governors.
- 5.17. Depending on the nature of the alleged abuse, the school may need to consider providing measures to protect and support the victim, the alleged perpetrator and other students and/or staff in the school by means of a risk assessment. The risk assessment should be recorded and kept under review.
- 5.18. All causes for concern, whether related or unrelated to Lokrum Fields, will be referred to Worcestershire County Council and other Local Authorities will be involved in accordance with their advice.
- 5.19. The DSL will work in co-production with parents when making the decision to close safeguarding incidents related to their child.

6. Recruitment, training and specific responsibilities

- 6.1. A robust recruitment process is always used at Lokrum Fields, in accordance with our Safer Recruitment Policy. All recruitment is overseen by staff who hold up-to-date training in best practice.
- 6.2. Our Designated Safeguarding Lead is a member of the senior leadership team. Their responsibilities are detailed in Appendix 2.
- 6.3. The DSL and deputy DSL undertake training at least annually to provide them with the knowledge and skills required to carry out the role.
- 6.4. The DSL or a deputy should ordinarily be available during school hours and ensure appropriate cover is in place for any out-of-hours or off-site activities.
- 6.5. Safeguarding training, including how to access and use CPOMS is provided to all staff, governors and regular volunteers during their induction. Updates and refresher training are provided at least annually.
- 6.6. All staff must read and be familiar with:

Safeguarding and Child Protection Policy (2021/22)



- 6.6.1. Part One and Annex B of the DfE guidance: “Keeping Children Safe in Education 2021”
- 6.6.2. Staff Code of Conduct
- 6.6.3. Safeguarding and Child Protection Policy
- 6.6.4. Behaviour Policy

- 6.7. Governors must read and be familiar with at least Annex B of the DfE guidance: “Keeping Children Safe in Education 2021”.

- 6.8. All personnel are expected to know the name of the DSL and their deputies and to understand these roles. All personnel are expected to understand their individual safeguarding responsibilities, to remain mindful of risks and to maintain an attitude of ‘it could happen here’. All staff are required to maintain their knowledge of safeguarding procedures and how to access CPOMS and to act accordingly.

- 6.9. Relevant regulatory bodies will be informed in the event that safeguarding concerns result in the dismissal, removal or resignation of any personnel.

7. Improving awareness and safeguarding skills

- 7.1. We are committed to raising awareness about safeguarding issues, including raising awareness of ongoing and emerging risks and how to recognise potential signs of abuse. We provide appropriate information and updates to staff, governors, volunteers and parents. We ensure parents are aware of our safeguarding responsibilities and procedures by providing this policy online.

- 7.2. We include safeguarding within the curriculum. We teach students about:
 - 7.2.1. The risks which they and others may face, including online risks and risks arising in a variety of contexts
 - 7.2.2. How to recognise if they are at risk
 - 7.2.3. How they can protect themselves and others
 - 7.2.4. How to get help
 - 7.2.5. How to keep themselves safe through Relationships, Sex, and Health Education

- 7.3. We provide students with opportunities to express their views, give feedback, engage in discussions and otherwise contribute to our approach to safeguarding.

- 7.4. Students at Lokrum Fields have additional needs which can make them vulnerable. We aim to recognise areas where students are particularly vulnerable and to provide information and skills training which is relevant to the individual. We ask clinicians to contribute to our safeguarding planning where appropriate.

- 7.5. The vulnerability of children with additional needs can extend to other members of the family. It is not uncommon for families to face challenging circumstances which can increase the risk of abuse and exploitation. We aim to inform and equip families to recognise risks and access appropriate help and we recognise our duty of care when working with families.

- 7.6. All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside

of these environments and that children may be at risk of abuse or exploitation in situations outside their families.

- 7.7. Behavioural traits associated with additional needs can overlap with behavioural indicators of abuse. We will liaise with clinicians to ensure our staff are equipped to recognise and respond appropriately to behavioural change.
- 7.8. Any significant behavioural change which has an unknown cause should be treated as a potential safeguarding concern. Staff should not assume that behavioural change will always be related to the student's additional needs.
- 7.9. Where a concern is escalated to an external agency, the referral should include relevant information about the student's additional needs.
- 7.10. We will share our knowledge of working with children with additional needs to improve the skills of staff from external agencies as appropriate.
- 7.11. We will raise concerns as appropriate if we have reasonable cause to believe that staff from external agencies are making incorrect decisions as a result of a lack of understanding of a student's additional needs or are seeking to interpret behaviour and communication without having the necessary clinical expertise.
- 7.12. Lokrum Fields is situated in a low crime area. Our students are drawn from a wide area with varying prevalence of different types of crime. We are vigilant to the possibility of students experiencing a wide range of threats outside Lokrum Fields. However, as a cohort, we consider that the greatest threat to our students is the vulnerability created by their additional needs. This is therefore our primary focus.

8. Providing students and staff with a safe environment

- 8.1. We require staff to act in a way which encourages students to feel safe, secure, valued, respected, listened to and treated with credibility.
- 8.2. We take care to ensure that students know that they can raise concerns with any member of staff.
- 8.3. We recognise that our students may be vulnerable as a result of their additional needs. We also recognise that students may be vulnerable for other reasons, for example as a result of previous abuse, witnessing violence or experiencing neglect. We provide a stable and predictable environment at Lokrum Fields, with a positive and supportive approach to help students feel safe and support their self-esteem.
- 8.4. We are committed to ensuring that students' wishes and feelings are given appropriate weight at all times. We will ensure that any contemporaneous views expressed by a student are recorded on safeguarding notes and referrals.
- 8.5. We maintain a Single Central Record of safeguarding checks. Regular visitors are required to provide the evidence required for our Single Central Record. The Single Central Record is checked by the Safeguarding Governor on a regular basis.

- 8.6. All visitors are required to provide photo ID on arrival and sign in and out. Visitors who have not completed safeguarding screening to our satisfaction are not permitted to engage with students unsupervised. Visitors wear badges to ensure students can recognise them easily. Regular visitors are required to complete safeguarding screening.
- 8.7. Lokrum Fields maintains safe and secure premises as detailed in our Health and Safety Policy and Premises Management Policy.
- 8.8. Lokrum Fields recognises that Covid-19 presents settings with additional safeguarding risks, including but not limited to: the risk of individuals contracting Covid-19 on site; risks associated with high levels of staff absence; risks of individuals experiencing mental health difficulties for example due to uncertainty and isolation; and risks associated with remote learning. We also recognise that if a student is vulnerable in their home environment then prolonged remote learning may expose them to greater risk. It may also be more difficult to identify emerging risks at times when face-to-face contact with students is limited. These risks are addressed in our Covid-19 risk assessment and our remote learning and e-safety guidelines. In addition, the DSL will review safeguarding arrangements at least once a week in the event of Lokrum Fields being closed to students during the pandemic and in the event of any students engaging in remote learning for more than two weeks. We will remain in regular contact with students and families throughout any period of remote learning, as part of our approach to supporting our students, and this will not be limited to areas of safeguarding concern. We will provide students and families with relevant information to help them avoid contracting Covid-19 both on site and off site and we will encourage families to use the NHS Covid app and follow Government guidance.
- 8.9. All off-site activities are subject to a risk assessment which includes safeguarding considerations.
- 8.10. We accept responsibility for safeguarding throughout the school day and during any time when a student is using school transport provided by Lokrum Fields. Where children are using school transport provided by Lokrum Fields, parents should make suitable arrangements to ensure their children are safe prior to being picked up and on being returned home. If a parent fails to make arrangements to collect their child from school or to ensure their child is met (as appropriate) on returning home via our school transport, we will use our discretion in making arrangements for the child to remain in the temporary care of school staff or in making a referral to an appropriate agency.
- 8.11. We promote a culture of transparency and accountability, where errors are resolved swiftly and improvements are implemented effectively. We aim to ensure everyone feels able to raise concerns and complaints without fear of adverse consequences. We expect staff and governors to be aware of our Whistleblowing Policy.
- 8.12. Any allegations of abuse made against a member of staff, governor or volunteer will be handled fairly and robustly in accordance with our documented policy.

9. Vulnerability of students with additional needs

- 9.1. Students with additional needs may struggle with low self-esteem and lack a sense of really fitting into a community. This can make them particularly vulnerable to exploitation by any person or group who makes them feel special and provides them with a sense of belonging.
- 9.2. Students who struggle with social communication skills and are used to being guided by others in their understanding of how society operates might be more easily manipulated into believing that abusive behaviour is normal and acceptable.
- 9.3. Students who require ongoing support into adulthood may be vulnerable to being exploited by future caregivers.
- 9.4. Students may be vulnerable to power imbalances in their relationships with professionals and clinicians.
- 9.5. Students with additional needs may over-respond or under-respond to pain. A light touch may cause unusual pain; deliberate or persistent light touch which causes pain is a safeguarding concern and must be taken seriously. Students may under-respond to pain associated with physical abuse; an under-response to pain should not detract from the seriousness of the abuse.
- 9.6. Students may be vulnerable to self-harm, suicidal thoughts, eating disorders and other mental health issues. They may reach the point of being at immediate risk very rapidly. A sudden and/or long-lasting deterioration may be triggered by events which seem incidental to an observer. The student may mask the extent of their deterioration; there may not be any warning or signs of distress prior to a student being at immediate risk of harm.
- 9.7. Students with additional needs may struggle to report concerns coherently or in a way which engenders credibility. Examples include:
 - 9.7.1. Having difficulty in initiating conversation or in knowing how to ask for help
 - 9.7.2. Having difficulty asking for help
 - 9.7.3. Recounting an experience in a monotone, in the third person or without showing emotion
 - 9.7.4. Wrongly assuming that a listener has prior knowledge or understanding of their circumstances
 - 9.7.5. Missing important details or focussing on unimportant details
 - 9.7.6. Displaying behavioural traits which could be mistaken for signs of lying, immaturity, disengagement or an indication that the situation is not serious
 - 9.7.7. Using phrasing or vocabulary which is beyond their years, potentially causing a listener to believe the words are not their own
 - 9.7.8. Being unable to communicate independently; requiring a trusted advocate or parent to assist them with communication
 - 9.7.9. Claiming that they are alright when in fact they are not (a form of masking)
 - 9.7.10. Telling an adult whatever they think is required to end a conversation quickly or avoid further questions.
- 9.8. Clinical input may be necessary to assist staff, Children's Services or Police in interpreting a student's presentation or account of events and in ensuring the

student is properly supported when reporting a concern or participating in an investigation.

- 9.9. We recognise that the vulnerability of our students demands a particularly robust approach to safeguarding at Lokrum Fields.

10. A whole-school approach to supporting students

- 10.1. The primary vulnerabilities of our students are related to:
- 10.1.1. Low self-esteem or poor sense of belonging in society
 - 10.1.2. Weak social skills or understanding of social norms
 - 10.1.3. Poor communication skills or ability to seek help
 - 10.1.4. Reduced independence and increased reliance on external support
- 10.2. We directly address these vulnerabilities through:
- 10.2.1. Providing regular opportunities for success and offering regular meaningful praise and encouragement
 - 10.2.2. Managing behaviour positively
 - 10.2.3. Following an academic curriculum which supports high aspirations for success
 - 10.2.4. Teaching skills for independent living
 - 10.2.5. Integrating social and communication strategies throughout the school day
 - 10.2.6. Teaching protective behaviours
 - 10.2.7. Supporting the development of meaningful friendships and social encounters
 - 10.2.8. Enabling students to contribute to society
 - 10.2.9. Encouraging self-determination, involvement in decision making and assertiveness skills
 - 10.2.10. Providing opportunities for students to take on manageable responsibility
 - 10.2.11. Offering emotional support, including facilitating peer-to-peer support
 - 10.2.12. Wherever possible, identifying and removing any barriers to a student's success
 - 10.2.13. Building trusting and communicative relationships with families.

11. Signs of abuse

- 11.1. The following are examples of what might be seen in school if a student is being abused or witnessing abuse:
- 11.1.1. Unexplained absence or lateness – for example, a student staying at home to protect an abused parent, to conceal injuries or because they are prevented from attending
 - 11.1.2. Attendance despite being ill
 - 11.1.3. Constant tiredness – for example, due to worrying at night or being exploited outside school
 - 11.1.4. Unexpected difficulties in completing their work
 - 11.1.5. An unexpected change in behaviour or personality
 - 11.1.6. Unusual quietness or withdrawal from friendships
 - 11.1.7. Unusual disruption or violence
 - 11.1.8. Good behaviour with no signs of anything being wrong

- 11.2. Some specific safeguarding risks may be indicated by additional or other signs, which are described later in this policy.

12. How we interact with other agencies

- 12.1. We strive to establish effective relationships with all relevant parties, including parents, clinicians and agencies.
- 12.2. We recognise the importance of working collaboratively with other agencies and sharing information as appropriate. The DSL will liaise with the three safeguarding partners (Local Authority, Health and Police) and work with other agencies in line with the statutory guidance, "Working Together to Safeguard Children". We will participate in Operation Encompass.
- 12.3. We will support vulnerable students and their families by signposting them to any external agencies which we have reasonable grounds to consider will be able to provide them with meaningful assistance. We will be open with families about our experiences of the relative strengths and weaknesses of external organisations, to help them make decisions in the best interests of the child.
- 12.4. We accept that families may legitimately decide to seek support from independent organisations, clinicians or other professionals rather than accepting support from public services. Unless we have reasonable grounds to consider that such a decision poses a safeguarding risk, we will uphold the right of families to engage with the support which they consider most suitable.
- 12.5. We recognise that mistakes can be made by all organisations and therefore we will take responsibility for carefully considering the merits of all advice from external agencies and professionals, giving appropriate weight to the expertise of the advisor and any independent quality assessments or regulation, before taking any action (except in emergencies). Where advice is provided by an individual whom we consider to have inappropriate expertise or experience, we will request the involvement of a more senior professional.
- 12.6. We recognise that professional disagreements may arise between any agencies and we aim to resolve these swiftly and in the best interests of the child. If we disagree with advice provided by an external agency, we will inform them of our decision unless we consider that doing so may create a safeguarding risk.
- 12.7. As part of our responsibility for safeguarding children, we will challenge any situation where we consider that action (or inaction) by another agency is failing to safeguard the child or promote their welfare. The DSL will maintain an awareness of local escalation and complaint procedures and will raise concerns with relevant agencies as appropriate.
- 12.8. We recognise that external agencies may base decisions and advice on information to which we are not privy and that we may not always understand their rationale. We also recognise that school staff may have a unique insight into family circumstances, the child's typical presentation at school and the relevance of a child's additional needs. Where professional disagreements arise, we will carefully consider the various skill sets and level of information which we understand to be

held by each organisation and, in light of this, we will use our judgement to reach decisions which we consider to be in the best interests of the child.

- 12.9. We will host and engage with multi-agency meetings where we consider this to be appropriate. We will maintain our duty of care towards families, and in particular towards students, throughout any such meetings. We will expect professionals to routinely declare their level of qualification and experience and for this to be minuted. Where documented information is referred to during meetings, we will expect the source and the qualifications of the original author to be minuted. We will expect participants from other organisations to provide us with assurance of their safeguarding practices and to confirm parental consent as applicable before we share any confidential information. We will expect meeting participants to uphold high standards of behaviour and we will not allow any malpractice to go unchallenged. Our meeting minutes will be made available to parents on request unless we consider that this has potential to create a safeguarding risk as per statutory requirements.
- 12.10. We are aware that there is potential for safeguarding risks in all circumstances, including amongst individuals who are involved with a family in any way and amongst family members. During any conversations and meetings relating to safeguarding, we will be alert to the risk of participants having motives which are contrary to the wellbeing of the child, including risks associated with coercive control, emotional abuse and institutional abuse. Any such concerns will be addressed in accordance with this policy.

13. Information sharing and record-keeping

- 13.1. We recognise that all matters relating to child protection are confidential and that disclosure to other members of staff, governors and external organisations should be on a need-to-know basis.
- 13.2. Data protection requirements do not override the responsibility to share information with other agencies where doing so is necessary for safeguarding purposes. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Where necessary, information may be shared without consent. Guidance is available online in “Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers”.
- 13.3. In accordance with data protection legislation, we will withhold education information if the sharing of information is likely to meet the threshold of causing serious harm.
- 13.4. The DSL must bring any serious or long-standing safeguarding matters to the attention of the Governor with safeguarding responsibility and the Proprietor within two months of a concern being raised, for the purpose of reviewing the efficacy of this policy and operational practice. Matters may be anonymised unless any party has reasonable grounds for considering this to be inappropriate.

- 13.5. The DSL must review every safeguarding file annually and on receipt of any additional report of concern. A clear timeline of incidents and activity must be maintained for each case.
- 13.6. All safeguarding records will be held securely and confidentially on CPOMS. Records will be passed securely to any subsequent school, via CPOMS if possible, as soon as possible unless doing so is reasonably considered to pose a safeguarding risk.
- 13.7. Staff, governors and volunteers must be aware that they cannot promise a child to keep secrets when doing so might compromise the child's safety or wellbeing. However, if a child expresses any concern about their information being shared, that concern must be taken seriously and recorded in the incident report. Where the child's expressed wishes go beyond the disclosure in question, they should be addressed in line with the Data Protection Policy.

14. Specific safeguarding issues

- 14.1. It is important for staff to be aware of a wide range of safeguarding risks, including understanding emerging risks, relevant vocabulary and the context in which safeguarding risks can occur. The remainder of this policy provides an overview of specific risks and the approach we take in response to those risks.
- 14.2. Additional information about specific forms of abuse and safeguarding issues can be found in Annex B of "Keeping Children Safe in Education 2021".

15. Physical abuse

- 15.1. Physical abuse includes any action which causes physical harm, for example: hitting, shaking, biting, throwing, poisoning, burning, scalding, drowning or suffocating.
- 15.2. Physical contact at Lokrum Fields is strictly controlled. Staff may use reasonable force if there is an immediate risk of a student causing harm to themselves or others. Any use of force is recorded and monitored in accordance with our Restrictive Physical Intervention Policy. Any misuse of force will be handled under safeguarding procedures and disciplinary procedures as applicable.

16. Emotional abuse

- 16.1. Emotional abuse is the persistent emotional maltreatment of a child which severely adversely affects their emotional development. All forms of abuse will include some emotional abuse but it may also occur in the absence of other forms of abuse.
- 16.2. Emotional abuse may include:
 - 16.2.1. Conveying to a child that they are worthless, unloved or inadequate
 - 16.2.2. Conveying to a child that they are valued only to the extent that they meet another's needs
 - 16.2.3. Not giving the child opportunities to express their views, silencing them, or ridiculing what they say or how they communicate

- 16.2.4. Having developmentally inappropriate expectations of the child (interactions and expectations beyond the child's developmental capability or being overprotective and limiting their development)
- 16.2.5. The child hearing or seeing abuse
- 16.2.6. Causing the child to feel frightened or unsafe (including bullying, exploitation, threats etc)

17. Sexual abuse

- 17.1. Sexual abuse involves forcing or enticing a child 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.
- 17.2. Sexual abuse may include:
 - 17.2.1. Physical contact, with or without penetration
 - 17.2.2. Non-contact activities such as producing or looking at sexual imagery or watching sexual activities
 - 17.2.3. Encouraging children to behave in sexually inappropriate ways
 - 17.2.4. Grooming a child in preparation for abuse

18. Neglect

- 18.1. Neglect is 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.
- 18.2. Neglect may include:
 - 18.2.1. Failing to meet basic physical needs (food, clothing, shelter)
 - 18.2.2. Failing to protect a child from physical or emotional harm or danger
 - 18.2.3. Inadequate supervision
 - 18.2.4. Failing to provide access to medical care
 - 18.2.5. Disregard for, or unresponsiveness to, a child's basic emotional needs

19. Online safety

- 19.1. Online safety is included within the curriculum and staff respond swiftly and robustly to any concerns raised about or incidents of inappropriate images or information being shared or received by students.
- 19.2. We actively monitor school devices, using SENSO software to identify any potentially inappropriate use and any potential safeguarding issues.
- 19.3. SENSO notifications are sent to the Lokrum Fields administration email address which is monitored by all designated safeguarding leads.
- 19.4. Where a detected violation can reasonably be assumed to be the result of a typographical error or is clearly reasonable within the context of the work being carried out, these are marked as 'False Positives' and no further investigation is necessary.
- 19.5. Where a detected violation does not fall into the above criteria, these are regarded as potential safeguarding concerns and appropriate investigative action is taken by

Safeguarding and Child Protection Policy (2021/22)



either a designated safeguarding lead or the member of staff's line manager, whichever is most senior.

- 19.6. All potential safeguarding concerns highlighted by SENSO, and any actions taken in investigating potential concerns, are appropriately recorded using CPOMS.
- 19.7. Any traffic over the school's internet connection is routinely filtered through our Smoothwall.
- 19.8. Students may require access to their personal devices during school hours, for example to provide reassurance that they can contact a parent as an anxiety management strategy. Access is managed through the ICT Acceptable Use Policy which includes safeguarding precautions.
- 19.9. Parents are encouraged to implement age-appropriate parental controls and internet filtering on personal devices used by students.
- 19.10. Where arrangements are made for students to access remote learning, including remote therapeutic support, safeguarding is always considered as an integral part of the planning. Arrangements will be updated as necessary in accordance with Government guidance, including "Safeguarding and remote education during coronavirus (COVID-19)". Our plans include:
 - 19.10.1. Communicating with parents about any websites which students may be asked to visit.
 - 19.10.2. Informing parents which members of school staff and which therapists will be interacting with students.
 - 19.10.3. Ensuring that timetabling allows for an appropriate amount of individual or group pastoral care, taking students' needs into account.
 - 19.10.4. Communicating regularly with parents so that any concerns, including any impact of remote learning on a student's wellbeing or ability to learn, can be promptly addressed.
 - 19.10.5. Providing students with clear guidance about appropriate behaviour for engaging in remote learning, including ensuring they are wearing appropriate clothing and working safely.
 - 19.10.6. Ensuring that all parties are provided with a clear means of reporting concerns (concerns should be notified in accordance with Section 5, without delay, in all circumstances).
 - 19.10.7. Providing refresher information to parents about internet safety, online support for reporting upsetting or harmful content, and advice in relation to cyber bullying.
 - 19.10.8. Advising staff and parents to communicate during school hours wherever possible, using approved school channels.
 - 19.10.9. Requiring staff to use school devices rather than personal devices and to communicate only via their school email address.
 - 19.10.10. Requiring staff to abide by the school's dress code for any remote teaching and to ensure that any background which may be visible over a webcam is appropriate.
 - 19.10.11. Advising staff to avoid sharing personal information with students without prior consideration of its appropriateness, including through allowing personal possessions or family members to be seen on a webcam.

- 19.10.12. Requiring staff to complete remote sessions with students from the Lokrum Fields premises in a room with the door open wherever this would provide a safeguarding benefit. Where this is not possible, requiring at least two members of staff to be present on any virtual meeting or the member of staff to be responsible for ensuring that the meeting is recorded.

20. Peer on peer (child on child) abuse

- 20.1. Peer on peer abuse refers to abuse perpetrated by another child, inside or outside school, including siblings.
- 20.2. Examples of peer on peer abuse include:
- 20.2.1. Bullying, including cyber bullying
 - 20.2.2. Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - 20.2.3. Abuse in intimate personal relationships between peers
 - 20.2.4. Sexual violence and sexual harassment
 - 20.2.5. consensual and non-consensual sharing of nudes and semi nudes images and videos (also known as sexting or youth produced sexual imagery)
 - 20.2.6. 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
 - 20.2.7. Initiation / hazing violence and rituals
 - 20.2.8. Emotional abuse
 - 20.2.9. Upskirting (a criminal offence which involves taking a picture under a person's clothing without their consent with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; upskirting can affect students of any gender)
- 20.3. Lokrum Fields recognises that even if there are no reported cases of peer on peer abuse, such abuse may still be taking place and is simply not being reported.
- 20.4. Although it is more likely that girls will be victims and boys' perpetrators, all peer on peer abuse is unacceptable and will be taken seriously.
- 20.5. Staff must never tolerate or dismiss concerns relating to peer on peer abuse and must not, for example, pass it off as 'banter', 'just having a laugh' or 'part of growing up'.
- 20.6. Peer on peer abuse must be treated as seriously as abuse by an adult.
- 20.7. If a student has suffered, or likely to suffer, significant harm, a safeguarding concern must be raised as detailed at Section 5.
- 20.8. Allegations of peer-on-peer abuse will be recorded, investigated, and dealt with, and victims, perpetrators, and other students supported as outlined in our Anti-Bullying Policy.
- 20.9. Our response to reports of sexual violence or sexual harassment will be in accordance with the DfE guidance, "Sexual violence and sexual harassment

between children in schools and colleges”, and Part 5 of Keeping Children Safe in Education 2021. Staff should refer to the latest version of guidance online.

- 20.10. Staff should have due regard to the need to support both the victim and the perpetrator, rather than focussing solely on addressing poor behaviour.
- 20.11. The DSL will consider external sources of support, such as Early Help (via the student’s relevant Local Authority) or the West Mercia Rape and Sexual Abuse Support Centre (www.wmrsasc.org.uk)

21. Children with additional vulnerabilities

- 21.1. Students at Lokrum Fields will often have additional vulnerabilities as a result of their SEND.
- 21.2. Students may also have additional vulnerabilities due, for example, to previous abuse, witnessing violence, experiencing neglect or as a result of being in care.
- 21.3. We will be mindful of the risks which can arise from poor communication when a student has multiple caregivers and involved professionals.
- 21.4. We will not assume that students are automatically safe or unsafe in their home environment, whether they live with parents or in care.
- 21.5. Where a student’s communication needs result in them being reliant on a parent or advocate to communicate on their behalf, we will be mindful of the possibility of the parent or advocate conveying their own interpretation rather than that of the student. Where appropriate, we will seek clinical advice in relation to this risk. We will not assume by default, or without reasonable grounds, that a parent or advocate is likely to be disingenuous.
- 21.6. Students may sometimes be involved in court proceedings - for example in the Family Court - and may be required to give evidence in court. Staff will refer to prevailing online guidance to support students in these circumstances.
- 21.7. Students with family members in prison are likely to have additional vulnerabilities. We will signpost students and families to supporting organisations as appropriate.

22. Child Sexual Exploitation (CSE)

- 22.1. Child Sexual Exploitation is the coercion, manipulation, or deception of a child into sexual activities. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE can affect any child or young person under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex.
- 22.2. The victims and the perpetrators may be male or female and may be acting individually or as part of a group.
- 22.3. CSE often involves ‘grooming’, a process of recruitment. Grooming may include:
- 22.3.1. Befriending by the perpetrator, online or offline

- 22.3.2. Befriending by a peer who is themselves involved in CSE
 - 22.3.3. Befriending or supporting the family (making themselves indispensable)
 - 22.3.4. Giving the child gifts, money, drugs, status, affection or accommodation prior to or following sexual activities
 - 22.3.5. Disruption of a child's support network, for example by portraying their parents as unreasonable or strict
 - 22.3.6. Luring a child to a party, either directly or via their peers
 - 22.3.7. Using drugs or alcohol to reduce a child's resistance
 - 22.3.8. Lies, blackmail and threats against the child or their family
- 22.4. CSE may occur through the use of technology without the child's consent or immediate recognition, for example through being persuaded to post sexual images over the internet or via mobile phone.
- 22.5. CSE often involves actual violence or threats of violence towards the child or their family, as a deterrent from disclosing the abuse or exiting the exploitation.
- 22.6. Young people are often drawn unwittingly into CSE. They may not recognise the coercive nature of the relationship or see themselves as a victim.
- 22.7. It is important to follow safeguarding procedures even if a student is resistant to what they may perceive as interference.
- 22.8. Warning signs of CSE could include a student:
- 22.8.1. Becoming secretive and not engaging with their usual friends
 - 22.8.2. Associating unusually with older men or women or appearing to be controlled by a relationship
 - 22.8.3. Returning home late, going missing, or being defensive about where they have been
 - 22.8.4. Receiving unusual (or an increased volume of) phone calls, messages or social media interaction
 - 22.8.5. Having possessions they couldn't usually afford
 - 22.8.6. Showing a change in mood or behaviour, appearing tired or unwell, or self-harming
 - 22.8.7. Attempting to conceal marks on their body or having unexplained injuries
 - 22.8.8. Adopting new 'street language' or reacting unexpectedly to place names
 - 22.8.9. Becoming distant from their family and support network
 - 22.8.10. Having an older boyfriend or girlfriend
 - 22.8.11. Contracting sexually transmitted infections or becoming pregnant
- 22.9. Warning signs of CSE overlap with warning signs for other types of abuse, such as Child Criminal Exploitation and County Lines.
- 22.10. On suspecting CSE, the DSL should complete the CSE Screening Tool which can be accessed on the relevant Local Authority's website. If the tool indicates any level of concern, the DSL should contact the Local Authority's Missing and Child Sexual Exploitation Forum. As always, if a student is in immediate danger the DSL should contact the police.

23. Child Criminal Exploitation (CCE)

- 23.1. Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce a young person to engage with criminal activity. Exploitation does not always involve physical contact; it may occur through technology. The victim may have been exploited even if the activity appears consensual.
- 23.2. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.
- 23.3. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see section 24 for more information), forced to shoplift or pickpocket, or to threaten other young people.
- 23.4. Some of the following can be indicators of CCE:
- 23.4.1. children who appear with unexplained gifts or new possessions
 - 23.4.2. children who associate with other young people involved in exploitation
 - 23.4.3. children who suffer from changes in emotional well-being
 - 23.4.4. children who misuse drugs and alcohol
 - 23.4.5. children who go missing for periods of time or regularly come home late
 - 23.4.6. children who regularly miss school or education or do not take part in education.
- 23.5. Warning signs of CCE overlap with warning signs for other types of abuse, such as CSE and County Lines.

24. County Lines

- 24.1. County Lines is an example of Child Criminal Exploitation, in which criminal networks use young people and vulnerable adults to move and store illegal drugs and money, often involving coercion, intimidation, violence (including sexual violence) and weapons.
- 24.2. Warning signs of County Lines include the warning signs for CSE and CCE. Additional warning signs could include a student:
- 24.2.1. Travelling alone to places far from home
 - 24.2.2. Carrying drugs or knowing how to access drugs
 - 24.2.3. Carrying weapons or knowing how to get access to weapons
- 24.3. Use of certain vocabulary might be indicative of a student being involved in County Lines. The following terms may be used:
- 24.3.1. Cuckooing – when gangs take over the home of a vulnerable person and use it as a base.
 - 24.3.2. Going country – a term for County Lines activity; may refer to the act of travelling to another place to delivery drugs or money.
 - 24.3.3. Trapping – selling or moving drugs.
 - 24.3.4. Trap house – a building used as a base, where young people may be forced to stay.
 - 24.3.5. Trap line – a mobile phone used for running and selling drugs.

25. Radicalisation, Extremism and Terrorism

- 25.1. Lokrum Fields has a statutory duty to have due regard to the need to prevent people from being drawn into terrorism (“the Prevent duty”). Our DSL and deputies maintain awareness of the local procedures for making a Prevent referral.
- 25.2. Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths, or calls for the death of members of our armed forces in this country or overseas.
- 25.3. Radicalisation is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 25.4. Terrorism is a threat or action that endangers or causes serious violence to person(s), causes serious damage to property, or seriously interferes with or disrupts an electronic system. The threat or action is designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 25.5. Radicalisation and promotion of extremism or terrorism will be treated as safeguarding concerns. Concerns should be reported to the DSL in the usual way.
- 25.6. Lokrum Fields follows the DfE guidance, “Protecting children from radicalisation – the Prevent duty”, which is available online.
- 25.7. Lokrum Fields engages as appropriate with Channel, a voluntary, confidential programme which supports people who are vulnerable to being drawn into terrorism.

26. Domestic Abuse

- 26.1. The definition of Domestic 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.
- 26.2. Witnessing domestic abuse (physical or otherwise) can have a serious and long-lasting emotional and psychological impact on children.
- 26.3. The impact of domestic abuse can include the following areas:
 - 26.3.1. Physical: A student may be hurt while intervening to stop the abuse. They may self-harm or develop eating disorders. They may suffer medical neglect. They may have suicidal thoughts, engage in substance misuse or consider running away.
 - 26.3.2. Sexual: Domestic abuse tends to engender fear and secrecy, which creates a climate in which sexual abuse may occur. A student may be forced to watch sexual abuse.
 - 26.3.3. Economic: Controlling behaviour of the abuser may limit the victim’s ability to fund a student’s needs.

- 26.3.4. Emotional: A student may be confused about their feelings – loving both parents but knowing the abuse to be wrong. They may be given negative messages about their self-worth. They may blame themselves for the abuse. They may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.
 - 26.3.5. Isolation: Students may not be allowed to see friends outside school. They may have frequent absences. They may have to move away from friends and family.
 - 26.3.6. Threats: Students may have heard threats being made against a parent, themselves, a sibling, or a pet, and may feel constant fear.
- 26.4. Children may have had to leave their family home as a result of domestic abuse. They may blame themselves for the domestic abuse.
- 26.5. Operation Encompass is a scheme through which schools are notified via WCC Children's Portal if police have been called or visited a family home. The portal link is https://capublic.worcestershire.gov.uk/Chs_Portal/HomePage.aspx.
- 26.6. On receiving a domestic abuse notification, the DSL should record this on CPOMS and complete the Operation Encompass referral record and notify relevant staff, taking care to avoid inappropriate sharing of information (for example, being aware that a member of staff may be a friend or relative of the family).
- 26.7. Staff should use their professional judgement, with clinical input if appropriate, to decide how best to support a student after being notified of domestic abuse. It is sometimes appropriate not to offer overt support and instead to monitor the student and respond to changes in mood or behaviour.

27. Sexting

- 27.1. "Sexting" or "youth produced sexual imagery" refers to the production, possession or distribution of sexual imagery via technology, including through text messages, email, social media and mobile messaging apps.
- 27.2. Sexual imagery involving anyone under 18 is illegal.
- 27.3. The sharing of sexual imagery of a person of any age with an under 18 is also treated as child sexual abuse.
- 27.4. Lokrum Fields follows Government guidance, "Sexting in schools and colleges: responding to incidents and safeguarding young people" and "Sharing nudes and semi-nudes: advice for education settings working with children and young people" modified to reflect the additional vulnerabilities of our students.
- 27.5. If a member of staff is concerned that a student has sexual imagery on a device, they should confiscate the device and set it to flight mode or, if this is not possible turn it off. Once they have ascertained that the content is of a concerning nature, staff should not view, copy or print the sexual imagery. The situation should be reported to the DSL without delay.
- 27.6. The DSL should consult Children's Services or the police if:

- 27.6.1. The incident involves an adult
- 27.6.2. There is reason to believe the student has been coerced, blackmailed or groomed or there are concerns about their capacity to consent
- 27.6.3. The imagery depicts content which is unusual for the student's development stage or are violent
- 27.6.4. The imagery involves sexual acts
- 27.6.5. The imagery involves anyone ages 12 or under
- 27.6.6. There is reason to believe the student is at immediate risk of harm (including self-harm or suicide)

28. Fabrication and Inducement (FII)

- 28.1. Fabrication occurs when a care-giver claims that a child is showing signs of illness when no such signs or illness are in fact present.
- 28.2. Inducement occurs when a care-giver causes a child to show signs of illness, potentially to support fabrication.
- 28.3. FII is exceedingly rare, with an estimated incidence of one child per million population per year.
- 28.4. Masking occurs when a person hides their additional needs in certain situations. Masking is common among children with autism and anxiety, often to a greater extent among girls.
- 28.5. Students who mask their difficulties at school can present very differently when they are in a situation where they feel able to be themselves. It can be difficult for people who have only seen a student while they are masking to believe the difficulties they exhibit when they are not masking.
- 28.6. Masking uses significant effort and this can contribute to meltdowns. When meltdowns occur in the home environment following a student masking at school, this can be confused with poor parenting.
- 28.7. FII is usually associated with a care-giver having unresolved psychological or behavioural problems (eg self-harm or substance abuse) but can also arise from financial need (eg for disability benefits). It is a serious safeguarding concern which can lead to care proceedings.
- 28.8. Parents of students with SEND can be wrongly accused of FII prior to the student being diagnosed, particularly where masking is occurring. Where parents' concerns have previously been dismissed by professionals, or where parents have faced criticism for seeking help for their child, they may be more reluctant to seek help for emerging issues or in respect of siblings. Professionals should mitigate this risk by creating trusting relationships with parents and raising awareness of masking.
- 28.9. Although not FII, a related safeguarding risk can arise when professionals wrongly advise a parent that their child has a medical condition. This may occur through a clinical error (eg misdiagnosis) or through professionals acting outside the boundaries of their expertise (eg attempted diagnosis by a non-clinical

professional). The primary risk is that the support or treatment provided for a child may then be inappropriate and their genuine needs may remain unmet.

29. Denial of medical need

- 29.1. Medical neglect encompasses a parent's delay or denial of the need to seek the necessary health care for a child.
- 29.2. Denial of health care is the failure to provide or to allow needed care (including mental health care) as recommended by a competent health care professional. Delay in health care is the failure to seek timely and appropriate medical care for a serious health problem (including mental health) that any reasonable person would have recognised as needing professional medical attention.
- 29.3. Medical neglect is a particular risk in relation to less visible medical conditions, such as mental health issues. Professionals, especially those who are non-clinical or who have not been trained in mental health issues, may struggle to recognise less visible medical conditions. This can be exacerbated if a child is masking.
- 29.4. Parents who are engaging in medical neglect may seek affirmation of their views from professionals. They may target professionals who are non-clinical or who lack relevant expertise. Professionals should be mindful that any comments they make may inadvertently contribute to medical neglect. If a professional considers it necessary to comment on an area which falls outside their qualifications, they should take care to disclose the limitations of their expertise and should recommend that the parent seeks appropriate expert advice.
- 29.5. Our standard approach at Lokrum Fields is to consider parents as being an expert in relation to their child. Where there is good reason to believe that medical neglect may be occurring, more weight should be given to information provided by clinical professionals than to information provided by the relevant parent.
- 29.6. If staff identify that a colleague is, or may be, contributing to medical neglect, they should raise a concern with the DSL. In addition to the standard safeguarding procedures, the DSL will involve Wider Ambition HR and/or follow whistle-blowing procedures as appropriate.
- 29.7. If staff identify that an external professional is, or may be, contributing to medical neglect, they should raise a concern with the DSL. In addition to the standard safeguarding procedures, the DSL should alert the professional's employer, follow whistle-blowing procedures and/or raise a concern with the relevant regulatory body, as appropriate.
- 29.8. Parents can struggle to access timely support for children with mental health issues and the diagnostic process is often lengthy. Despite a parent's best endeavours, medical support is not always available when it is needed. Staff should be mindful that delays in a student receiving a correct diagnosis or appropriate support can create a safeguarding risk. For example, unsupported mental health needs can result in a greater risk of self-harm and can have long-term consequences. Staff should use their professional influence wherever possible to support the timely

provision of medical care, including whistle-blowing whenever a failure of a local service presents a safeguarding risk.

30. Honour-Based Abuse

- 30.1. HBA encompasses incidents or 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. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators.
- 30.2. HBA refers to violence which is used to control behaviour within families or social groups to protect perceived cultural or religious beliefs and/or honour. Violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. It is a violation of human rights and may constitute domestic and/or sexual abuse.
- 30.3. HBA can also occur in relation to dating, arranged marriages, types of clothing and participation in leisure activities.
- 30.4. Any concern regarding a child that might be at risk of HBA or who has suffered from HBA, should be reported to the DSL who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care.

31. Female Genital Mutilation (FGM)

- 31.1. Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.
- 31.2. If a member of staff is informed by a student that an act of FGM has been carried out on her or observes physical signs which lead to a suspicion of FGM, they must report this to the police force in the student’s home area within one working day. This is a statutory requirement for all staff who engage in teaching and should also be adhered to by non-teaching staff.
- 31.3. Staff should promptly inform the DSL of any concerns and of any action they have taken but must report any ‘known’ cases of FGM to the police themselves.
- 31.4. Staff should never examine a student to ascertain whether FGM may have taken place.
- 31.5. Staff should be alert to concerns expressed by a student about any holiday plans.
- 31.6. Where staff are concerned about the possibility of FGM, except in a ‘known’ case, they should raise their concern with the DSL. The DSL should contact Children’s Services and should not contact the student’s parents unless advised to do so.
- 31.7. A useful Home Office Fact Sheet can be found here: <https://tinyurl.com/y6vqkwmz>

32. Breast Ironing

- 32.1. Breast ironing is practised in some African countries, notably Cameroon. It involves heat being applied to girls' breasts between the ages of 9 and 15, to slow down development.
- 32.2. Breast ironing is perceived to reduce the risk of sexual harassment, rape, forced marriage and kidnapping, by maintaining a child-like appearance for longer. Regardless of the motives, it is a form of physical abuse.
- 32.3. Where staff are concerned about the possibility of breast ironing, they should raise their concern with the DSL. The DSL should contact Children's Services and should not contact the student's parents unless advised to do so.

33. Forced Marriage

- 33.1. Forced marriage is a marriage in which one or both of the parties have been coerced to participate. The coercion may include physical, psychological, sexual and emotional abuse. Forcing a person to marry is a criminal offence.
- 33.2. A forced marriage is not the same as a pre-introduced or arranged marriage, in which the final choice of whether or not to participate remains with the prospective spouses.
- 33.3. Staff who are concerned that a student is at risk of forced marriage should raise their concerns with the DSL, who should contact Children's Services. Staff should not discuss concerns with the parent or attempt to mediate.

34. Children Missing Education

- 34.1. Unexplained absence is a potential indicator of abuse and neglect, including sexual exploitation and trafficking.
- 34.2. Staff should be alert to signs of children being at risk of travelling to conflict zones, those at risk of FGM or forced marriage, and the particular vulnerabilities of looked after children who go missing.
- 34.3. We endeavour to hold at least two current emergency contacts for each student and will regularly remind parents to inform us of any changes to their contact details.
- 34.4. We will enter students on the admission register at the beginning of the first day on which we have agreed that the student will attend the school. Where this occurs at a non-standard transition point, we will notify the relevant local authority within five days.
- 34.5. We will monitor students' attendance through the daily registration procedure.
- 34.6. Any incidence of a student failing to attend on the agreed start date or a student failing to attend regularly, or missing ten school days or more without permission, should be reported to the DSL, who will undertake reasonable enquiries to establish

the child's whereabouts and consider notifying the relevant local authority at the earliest opportunity.

- 34.7. Where a parent or a student notifies us that the student is registered at another school or will be attending a different school in future we will record this on the admissions register and inform the relevant local authority at the earliest opportunity.
(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf 26)

35. Modern Slavery

- 35.1. Lokrum Fields has a statutory duty to notify the National Crime Agency if a member of staff has reasonable grounds to believe that a person may be a victim of modern slavery of human trafficking.
- 35.2. Staff should report concerns (which may be in relation to a student or their parents, for example) to the DSL, who must contact the National Crime Agency.

36. Private Fostering

- 36.1. Private fostering is when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or under 18 if the child is disabled. Children looked after by a Local Authority or placed in a residential school, children's home or hospital are not considered to be privately fostered.
- 36.2. Private fostering is not in itself a safeguarding concern. However, some safeguarding risks can be associated with these arrangements, for example the possibility that a child has been trafficked into the UK.
- 36.3. By law, a parent, private foster carer or other persons involved in the private fostering arrangement must notify Children's Services of the arrangement. If we become aware of a private fostering arrangement, we will check that Children's Services have been informed.

37. Homelessness

- 37.1. If we become aware that a family is at risk of being homeless, we will signpost them towards available support.
- 37.2. Students aged 16 and over may be living independently. If we become aware that they are at risk of homelessness, we will make a referral to Children's Services.

38. Children who need a social worker (Child in Need and Child Protection Plans)

- 38.1. We recognise that when a child has a social worker, it is an indicator that a child is more at risk than most students. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning behaviour and maintaining good mental health. Where students have a social worker, this will inform our decisions about safeguarding (for example, responding

to unauthorised absence or missing education where there are known safeguarding risks) and promoting their welfare and best outcomes.

39. Looked after children and previously looked after children

- 39.1. Children in care often have a history of experiencing or witnessing abuse or neglect and staff should be aware of their vulnerability.
- 39.2. Appropriate staff will have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.
- 39.3. Appropriate staff will have information about the child's care arrangements and the levels of authority delegated to the carer by the Local Authority with responsibility.
- 39.4. The DSL will have details of the child's social worker and the name of the virtual school head in the relevant Local Authority.
- 39.5. If a student is or becomes a care leaver, the DSL should have details of the child's Personal Adviser at the relevant Local Authority and will liaise with them as appropriate.

40. Mental Health

- 40.1. We recognise 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.
- 40.2. All staff will be mindful of how abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on students' mental health, behaviour and education.
- 40.3. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Lokrum Fields staff will observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 40.4. Staff who have a concern about a student's mental health that is also a safeguarding concern, will take immediate action, follow the Safeguarding and Child Protection Policy and report their concern to the designated safeguarding lead or a deputy.

Appendix 1 – Concern Logging Form



Student's Name:	Student's Date of Birth:
Date of incident/disclosure:	Time of incident/disclosure:
Name of the person about whom a concern has been raised:	Position held:
Note the reason(s) for recording the incident.	
Details of concern/incident - record the who/what/where/when factually. In the case of a disclosure, use the child's own words as far as possible:	
Names of any witnesses:	
Any immediate action taken:	
Any other relevant information	
Member of staff with responsibility for safeguarding to whom this has been reported.	
Reporting staff signature _____ Date _____ Time _____	
DSL – Response/Outcome	
DSL signature _____ Date _____	

Appendix 2 – Designated Safeguarding Leads – Job Descriptions



Appendix 2

Designated Safeguarding Lead – Job Description

1. The Designated Safeguarding Lead has lead responsibility for safeguarding and child protection, including online safety.
2. The DSL must respond swiftly and appropriately to all safeguarding concerns, using the procedures detailed in the Safeguarding and Child Protection Policy.
3. The DSL must keep accurate written records on CPOMS of all safeguarding issues, including conversations, decisions and correspondence, and must ensure these are stored securely and confidentially in a form which would enable effective handover of the case in their absence.
4. The DSL will be responsible for designating appropriate levels of access to information for all staff and contracted therapists.
5. The DSL will help promote the educational outcomes for students, including those with a social worker, by effective information sharing about welfare, safeguarding, and child protection issues. They will ensure that staff know who these children are, understand their progress and attainment, and maintain high aspirations, including supporting staff to identify challenges and any additional support required for these students.
6. The DSL should have an effective knowledge of local referral arrangements and child protection procedures.
7. The DSL is the primary point of contact for liaison with external agencies as detailed in the Safeguarding and Child Protection Policy, including referral, case management and notifications to:
 - 7.1. The Local Area Designated Officer
 - 7.2. The Family Front Door and/or Early Help at the relevant Local Authority
 - 7.3. The relevant police force
 - 7.4. The National Crime Agency
 - 7.5. The Disclosure and Barring Service
 - 7.6. The Teaching Regulation Agency
 - 7.7. Any employer or regulatory body governing external professionals
8. The DSL is responsible for supporting any member of staff who has made a referral to a relevant agency in accordance with the Safeguarding and Child Protection Policy.
9. The DSL is responsible for liaising with staff and the Proprietor in relation to:
 - 9.1. The safety of students (including online safety and safety during extended activities)
 - 9.2. Maintaining a culture of strong safeguarding practice, including training and recruitment
 - 9.3. Ensuring safeguarding risks and protective behaviours are given appropriate weight in the curriculum
 - 9.4. Raising awareness about safeguarding issues and procedures, both at Lokrum Fields, on the school website and in communications with parents

Appendix 2 – Designated Safeguarding Leads – Job Descriptions

- 9.5. Ensuring students have an accessible means of raising concerns and will be listened to
- 9.6. Making decisions, for example in relation to a potential referral
- 9.7. Sharing information about specific students appropriately and as necessary
10. The DSL must participate in appropriate Safeguarding and Prevent training at least annually and ensure that all staff and governors participate in appropriate induction and refresher training. The DSL should subscribe to and read regular safeguarding updates and attend regular safeguarding events to maintain their knowledge.
11. The DSL is responsible for liaising appropriately with a student's subsequent educational establishment and ensuring their child protection file is passed on securely, via CPOMS where possible, including appropriate sharing of information under robust confidentiality arrangements prior to a student's transfer, to ensure necessary support and precautions are implemented.
12. The DSL is expected to make themselves available whenever practicable to listen to students and to respond to safeguarding concerns during school hours. Safeguarding must be prioritised over all other duties subject to not having an unreasonably detrimental effect on other students.
13. The DSL will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings and/or to support other staff to do so, and to contribute to the assessment of children. It is the responsibility of the DSL to alert Wider Ambition HR and the Headteacher in the event of there being any obstacles to them being able to complete their role effectively.
14. In the event of the DSL managing a safeguarding concern in relation to the Proprietor, it is important that they act with appropriate independence. The DSL is authorised to liaise with the Local Area Designated Officer without the knowledge of the Proprietor where necessary and to seek independent legal advice, at reasonable cost to Wider Ambition, if appropriate.
15. The DSL must persistently raise any concerns they have in relation to the implementation, monitoring, updating or effectiveness of safeguarding at Lokrum Fields. Concerns should be escalated as appropriate to the Headteacher, the Proprietor, the Safeguarding Governor, the Chair of Governors or the Local Area Designated Officer. The DSL is protected under our Whistleblowing Policy in relation to any concerns which are raised in good faith.

Deputy Safeguarding Lead – Job Description

1. The Deputy Safeguarding Lead is required to take on the role of the Designated Safeguarding Lead in the event of the Designated Safeguarding Lead being unavailable.
2. The Deputy must maintain appropriate training, knowledge and skill to enable them to cover effectively for the Designated Safeguarding Lead.

Appendix 2 – Designated Safeguarding Leads – Job Descriptions



3. In the event of the Designated Safeguarding Lead being temporarily unavailable or being implicated in a safeguarding concern, the Deputy must undertake all necessary actions relating to prevailing concerns.
4. In the event of the Designated Safeguarding Lead being unavailable for a longer period, the Deputy must take on responsibility for routine planning, preventative and strategic safeguarding issues such as would ordinarily have taken place during that timeframe, as well as handling any concerns arising.
5. In the event of the Designated Safeguarding Lead being expected to be unavailable for more than 28 days, the Deputy Designated Safeguarding Lead should alert Wider Ambition HR and the Headteacher to the need to appoint a further, suitably trained, Deputy for the period of absence. Similarly, if the Deputy Designated Safeguarding Lead is expected to be absent for more than 28 days, the Designated Safeguarding Lead should alert Wider Ambition HR and the Headteacher to the need to appoint a further, suitably trained, Deputy for the period of absence