

The Potteries School

• **ABERMULE NEWTOWN POWYS SY15 6JH** •

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POLICY: Safeguarding Policy

COMPILED	IMPLEMENTED	COORDINATED	REVIEWED
05/06/2017	05/06/2017	Andy Joynson	01/09/2026

SAFEGUARDING CONTACT INFORMATION

Designated Safeguarding Lead for the school is: Andy Joynson

Contact email: potteries.school@greenfields.uk.com

Tel: 01686 630176 Mobile: 07989 791484

Deputy Designated Safeguarding Lead for the school is: Stephen Royds

Contact email: stephen.royds@greenfields.uk.com

Tel: 01686 630176 Mobile: 07471 036916

Designated Safeguarding Lead for the home is: Stephen Royds

Contact email: stephen.royds@greenfields.uk.com

Tel: 01686 630176 Mobile: 07471 036916

Deputy Designated Safeguarding Lead for the home is: Lucy Scotford

Contact email: lucy.scotford@caretech-uk.com

Tel: 01686 630176 Mobile: 07471 036957

Designated Safeguarding Lead for CareTech Education: Andrew Sutherland

Contact email: andrew.sutherland@caretech-uk.com

Tel: 0141 587 2710 Mobile: 07701 314378

Designated Safeguarding Lead for Greenfields: Melanie Grace

Contact email: melanie.grace@greenfields.uk.com

Tel: 01633 212414 Mobile: 07919 480721

Powys Local Safeguarding Board: Powys Front Door

Contact email: people.direct@powys.gov.uk

Tel: 01597 827666 (Option 1: Option 1)

Powys Education Safeguarding LADO: Michael Gedrim

Contact email: michael.gedrim@powys.people.gov.uk

Tel: 01597 826431

If the child is at immediate risk, please call the police on 999.

PART 1 Safeguarding Policy

Introduction

The Potteries School is part of an integrated intake and assessment centre in Mid-Wales. It is registered as an independent special school with the Welsh Assembly Government for learners who are looked-after children and present with emotional and behavioural difficulties. The enrolment is for a period of up to 26 weeks. Our core safeguarding principles are:

- It is the school's responsibility to safeguard and promote the welfare of learners;
- Safeguarding is everyone's responsibility: for services to be effective each individual and organisation should play their full part;
- A child-centred approach: for services to be effective they should be based on a clear understanding of the needs and views of learners;
- Learners who are and who feel safe make more successful learners;
- Learners will feel safe and become successful learners where the school has a strong ethos of caring, openness and mutual respect;
- Representatives of the whole-school community of learners, corporate parents, and education staff should be involved in policy implementation and review;
- Once developed, policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for an earlier date of review.

Statutory Framework for Safeguarding in Education

The standards prescribed regarding safeguarding of children and learners in education are set out in the Independent School Standards (Wales) Regulations 2003 made under section 157 of the Education Act 2002. These relate to the following legislation:

- The Children Act 1989;
- The Children Act 2004;
- Section 175 of the Education Act 2002 (local authorities, governing bodies of maintained schools and institutions in the further education sector);
- Section 157 of the Education Act 2002 (non-maintained and independent schools);
- Sections 141F, 141G and 141H of the Education Act 2002;
- The Independent Schools Standards Wales Regulations 2024;
- Section 28 of the Children Act 2004 (other agencies);
- Wales Safeguarding Procedures 2019 (see Working Together to Safeguard People);
- Part 7 of the Social Services and Well Being Act (Wales) 2014;
- Keeping Learners Safe 2022
- ALN and Education Tribunals Act 2018

Policy statement, principles and aims

The whole school recognises a moral and statutory responsibility to safeguard and promote the welfare of all learners. Support staff provide a safe and welcoming environment where learners are respected and valued. All support staff are alert to the signs of abuse and neglect and follow the school procedures to ensure that learners receive effective support, protection and justice.

The procedures contained in this policy apply to all education and care staff working within the school and are consistent with those of I & A Services, CareTech Children's Services and the Powys Local Safeguarding framework.

Principles

- The school will ensure that the welfare of learners is given paramount consideration when developing and delivering all school activities;
- All learners, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection under this policy;
- All support staff have an equal responsibility to act on any suspicion or disclosure that may suggest a learner is at risk of harm in accordance with this guidance;
- All learners and staff involved in child protection issues will receive appropriate support from the senior management of the school who will follow this policy guidance in doing so.

Aims

- To provide all support staff with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of learners in the school;
- To ensure consistent good practice across the school;
- To demonstrate the school's commitment with regard to safeguarding its learners.

Reporting Concerns

If a learner makes a disclosure, then the member of the school support staff they must:

- listen to the learner;
- remain calm;
- offer reassurance;
- not ask the learner to remove or adjust clothing if bruises are observed;
- not ask leading questions;
- let the learner speak freely;
- accept what has been told them without challenge;
- not offer opinion, criticize or lay blame;
- reassure the learner at the end of the disclosure;
- not promise confidentiality but inform them that other people need to be told;
- record accurately and factually what the learner has said in note form;
- record observed injuries or bruises on a map of the body;
- submit a completed record of safeguarding concern form to the designated person who will seek advice from the Local Authority Designated Officer.

If a member of the support staff suspects that a learner may be a victim of abuse but feels that they have insufficient evidence to complete the record of safeguarding concern form, then they must submit a completed school welfare concern form to the designated person.

The Designated Safeguarding Person will then:

- decide whether to take this referral further or to monitor the situation;
- inform the person making the initial referral of their decision;
- prepare documents in readiness for a case conference/core group meeting.

The individual responsible for recording all details of safeguarding incidents, allegations and referrals is the Designated Safeguarding Lead (Andy Joynson). The details of the incident are uploaded to Behaviour Watch. The record needs to be completed within 24 hours of the incident and the Regional Lead for Education notified.

If a parent/ person with parental consent makes a disclosure to school, the Designated Safeguarding Lead will:

- meet with the parent/person with parental authority recording all details;
- assure the parent/ person with parental authority that the school will take the matter seriously;
- state that he/she will have to take advice from the Local Authority Designated Officer about the disclosure;
- inform the Education Regional Lead and discuss the disclosure;
- get back to the parent when a decision has been taken and how to proceed.

If the learner is at immediate risk, please call the police on 999.

Procedure to deal with allegations

All allegations are to be reported immediately.

Step 1

Designated Safeguard Lead informed & allegations reported.

Step 2

The following are informed immediately:

Designated Safeguarding Lead for the school: Andy Joynson

Contact email: potteries.school@greenfields.uk.com

Tel: 01686 630176 Mobile: 07989 791484

Tel: 01686 630176 Mobile: 07471 036916

Designated Safeguarding Lead for CareTech Education: Andrew Sutherland

Contact email: andrew.sutherland@caretech-uk.com

Tel: 0141 587 2710 Mobile: 07701 314378

If the allegation concerns the **Designated Safeguard Person**, the procedure as above except Step 1 is led by both:

Deputy Designated Safeguarding Lead for the school: Luke Jarman

Contact email: stephe.royds@greenfields.uk.com

Tel: 01686 630176 Mobile: 07471 036916

Designated Safeguarding Lead for CareTech Education: Rob Mcconomy

Contact email: rob.mcconomy@cambiagroup.com

Mobile: 07827 302334

Step 3

All safeguarding referrals are to be sent to:

Powys Local Safeguarding Board: Powys Front Door

Contact email: people.direct@powys.gov.uk

Tel: 01597 827666 (Option 1: Option 1)

Please note that all support staff are entitled to make a direct referral to the local safeguarding board if they wish to do so.

Step 4

This initial conversation will establish the validity of any allegation and if referral is needed to Children Social Care. If this is the case a strategy meeting will be called that the **Designated Safeguarding Lead** should attend. The decision of the strategy meeting could be:

- An investigation by children's social care;
- A police investigation if there is a criminal element to the allegation;
- Single agency investigation completed by the school with the **Designated safeguarding Lead**.

Terminology

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. Safeguarding means:

- protecting children from abuse and maltreatment;
- preventing harm to children's health or development;
- ensuring children grow up with the provision of safe and effective care;
- taking action to enable all children and young people to have the best outcomes.

Child Protection is the process of protecting individual children identified as suffering or likely to suffer significant harm. Child protection is part of the safeguarding process and includes procedures that detail how to respond to concerns about an individual child.

Staff refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

Learners refers to all children/young people who have not yet reached their 18th birthday.

Parent refers to birth parents and other adults who are in a parenting role, for example corporate parents, step-parents, foster carers and adoptive parents.

Context

Section 175 of the Education Act 2002 requires local education authorities to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children/learners.

Section 157 of the same act and the Independent Schools Standards Wales Regulations 2003 require proprietors of independent schools to have arrangements to safeguard and promote the welfare of children/learners who are learners/students at their schools.

Research suggests that more than 10 per cent of children will suffer some form of abuse. Due to their day-to-day contact with children/learners, support staff are uniquely placed to observe changes in behaviour and to recognise the outward signs of abuse. Learners in this school may also turn to a trusted adult when they are in distress or at risk. It is vital that all support staff are alert to the signs of neglect and abuse and understand the local procedures for reporting and acting upon their concerns (see Keeping Learners Safe 2022).

Roles and responsibilities

All schools must nominate a senior member of staff to coordinate safeguarding arrangements and this person is named in this policy guidance. The **Designated Safeguarding Lead** for safeguarding and child protection at the Potteries School is **Andy Joynson**. The school must ensure that the DSL:

- is appropriately trained;
- acts as a source of support and expertise to the school community;
- understands Powys Front Door and All Wales Child Protection procedures;
- keeps written records of all concerns when noted and reported by staff or when disclosed by a learner, ensuring that such records are stored securely and reported onward in accordance with this policy guidance but kept separately from the learners general files;
- refers cases of suspected neglect and/or abuse to children's social care or police in accordance with this guidance and local procedures;
- notifies children's social care if a learner with a child protection plan is absent for more than two days without explanation;
- ensures that when a learner with a child protection plan leaves the school, their information is passed to their new school and the learner's social worker is informed;
- attends and/or contributes to child protection conferences in accordance with local procedure and guidance;
- coordinates the school's contribution to child protection plans;
- develops effective links with relevant statutory and voluntary agencies;
- ensures that all staff sign to indicate that they have read and understood this policy;
- ensures that the safeguarding policy is updated annually;
- liaises with the nominated officer and head teacher (if not the DSL) as appropriate;
- keeps a record of staff attendance at child protection training, ensuring all staff new to the school receive training and information as part of their induction;
- makes this policy available to parents/carers.

The head teacher:

- ensures that the safeguarding and child protection policy and procedures are implemented and followed by all staff;
- allocates sufficient time and resources to enable the Designated Safeguarding Lead and deputy to carry out their roles effectively, including the assessment of learners and attendance at strategy discussions and other necessary meetings;
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school and Caretech's whistleblowing procedures;
- ensures that learner's safety and welfare is addressed through the curriculum.

Good practice guidelines

To meet and maintain our responsibilities towards learners, the school community agrees to the following standards of good practice:

- treating all learners with respect;
- setting a good example by conducting ourselves appropriately,
- involving learners in decision-making which affects them;

- encouraging positive and safe behaviour among learners;
- being alert to changes in a learner's behaviour;
- recognising that challenging behaviour may be an indicator of abuse;
- reading and understanding all of the school's safeguarding and guidance documents on wider safeguarding issues, for example bullying, physical contact, e-safety plans and information-sharing;
- maintaining appropriate standards of conversation and interaction with and between learners and avoiding the use of sexualised or derogatory language and challenging the use of such language if it occurs;
- being aware that the personal and family circumstances and lifestyles of some learners lead to an increased risk of neglect and or abuse.

Abuse of trust

All school staff are aware that inappropriate behaviour towards learners is unacceptable and that their conduct towards all learners must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a learner under 18 may be a criminal offence, even if that learner is over the age of consent.

Learners who are particularly vulnerable

Some learners in the community are at increased risk of neglect and or abuse. Many factors can contribute to this increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens or who have a high level of tolerance in respect of neglect. All learners attending this school are considered vulnerable due to a history of and/or presenting social emotional and mental health needs (SEMH). To ensure that all of our learners receive equal protection, we will give special consideration and attention to learners who:

- are disabled or have special educational needs;
- are or have been living in a known domestic abuse situation;
- are affected by known parental substance misuse;
- are asylum seekers or refugees;
- are vulnerable to being bullied or engaging in bullying;
- belong to a family in temporary accommodation;
- belong to a family who are known to have a transient lifestyle;
- belong to a family with a chaotic, neglectful and unsupportive home situation;
- are vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- have involved directly or indirectly in prostitution or child trafficking;
- do not have English as a first language.

Support for those involved in a child protection issue

Child neglect and abuse is devastating for the learner and can also result in distress and anxiety for staff who become involved. The school will support the learners, their families and staff by:

- consider all disclosures with integrity;

- nominating a link person, with no conflict of interest, who will keep all parties informed and be the central point of contact;
- responding sympathetically to any request from a learner or member of support staff for time out to deal with distress or anxiety caused by this situation;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of help lines, counselling or other avenues of external support;
- following the procedures laid down in whistle blowing, complaints and disciplinary procedures;
- cooperating fully with relevant statutory agencies.

Complaints procedure in respect of poor practice behaviour

All complaints are operationalised through the **Potteries School Complaints Policy (updated 03/03/2023)**. Our complaints procedure will be followed where a learner or parent/ person with parental responsibility raises a concern about poor practice towards a learner that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a learner, using sarcasm or humiliation as a form of control, bullying or belittling a learner or discriminating against them in some way. Complaints are managed by senior staff, the Headteacher and CareTech Head of Education. Complaints from staff are dealt with under CareTech's complaints and disciplinary and grievance procedures.

If you have concerns about a colleague

Support staff who are concerned about the conduct of a colleague towards a learner are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. Their first port of call with regards to these concerns is the **Designated Safeguarding Lead** (Andy Joynson).

Staff who are the subject of an allegation

When an allegation is made against a member of support staff working at the school the procedure set out in this policy must be followed. Alongside legitimate allegations, learners can also make false or malicious allegations and thus compliance with the procedure is fundamental. . A learner may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, some adults do pose a serious risk to learner welfare and safety and support staff must act on every allegation made. Support staff who are the subject of an allegation have the right to have their case considered fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but in some cases, support staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Allegations against staff should be reported to the Designated Safeguarding Lead (Andy Joynson). If allegations are made against care staff that are supporting in Education then the Registered Manager (Luke Jarman) of the home also needs to be informed. If a support staff member needs to raise the above concerns about the Designated Safeguarding Lead (Andy Joynson) then the referral is to be made to the Designated Safeguarding Lead for CareTech Education (Rob Mcconomy). Conversely, if the staff member has concerns regarding the Registered Manager, then referral to the Designated Safeguarding Lead (Andy Joynson) is the line of responsibility. In all cases, the support staff member may refer their concerns directly to Powys Front Door, health and social care or the police.

Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff will receive training during their induction. All staff, including the Head Teacher (unless the Head Teacher is the Designated Safeguarding Lead) will receive safeguarding training through the Myrus eLearning portal. The Headteacher undertakes Designated Safeguarding Person training at level three which is renewable every three years. The Proprietor representative also undertakes Designated Safeguarding Person training again updated every three years.

Safeguarding training is updated on an annual basis and this is recorded in a safeguarding training log by the Headteacher.

Safer recruitment

All safer recruitment issues are operationalised through the corporate **Caretech Safer Recruitment Policy**. Our school endeavours to do our utmost to employ safe staff by ensuring our recruitment, selection and pre-employment processes are in line with statutory guidance including Disclosure and Barring Service (DBS) and 'Keeping learners safe 2022'. CareTech and the Potteries School will also ensure that any contractor or their employees has been subject to the appropriate level of DBS check prior to undertaking work in school. Safer recruitment means that all applicants will:

- complete an application form;
- provide three referees, including at least one who can comment on the applicant's suitability to work with learners;
- Provide full employment history, detailing all employment involving work with children and learners (explaining reasons for any gaps in employment);
- provide evidence of identity and qualifications;
- be checked through the Independent Safeguarding Authority and have a valid DBS certificate or proof of DBS update service;
- be interviewed.

Regulated activity requires an enhanced DBS certificate and this includes barred list information. Regulated activity is if a member of staff:

- Will be responsible on a regular basis in the school for teaching, training, instructing, caring for or supervising learners;
- Will carry out paid or unsupervised unpaid work regularly in the school where that work provides an opportunity for contact with learners.

For staff who have regular contact not classed as regulated activity: an enhanced DBS certificate which does not include a barred list check will be appropriate. This would include contractors that would have the opportunity for contact with learners and who work under a temporary or occasional contract.

Single Central Record

Keeping Learners Safe (2025) sets out the school's responsibility to keep all staff details on the Single Central Record. This will cover the following:

- All staff (including supply staff and teacher trainees on salaried routes) who work at the school:
- Proprietors, responsible individuals, health and safety representatives and education managers (where appropriate).

Safer recruitment means that all applicants will (appropriate to the role & responsibility) meet the following DBS requirements:

- Personal identity checks;
- Qualifications and registrations;
- Children's barred list check;
- Prohibition from teaching check;
- Childcare disqualification;
- Prohibition from management;
- Disclosure and barring service;
- EEA check;
- Right to work in the UK;
- S128 check;
- References.

The SCR is maintained by both the Greenfields Administration Service and the Headteacher at the school. Both a spreadsheet and entries into BehaviourWatch are the methods of recording and monitoring and the Regional Lead for Education has oversight on this process.

All new members of staff will undergo an induction that includes familiarisation with the school's safeguarding and child protection policy and identification of their own safeguarding and child protection training needs.

Safeguarding with school visitors

As the school is within an annexe of The Potteries home, the entry and monitoring of visitors is carried by both care staff and the Headteacher. All appointments are noted in the shared diary and this is used to confirm the visit's authenticity. All visitors must comply with the following:

- Produce a valid and contemporary form of evidence that confirms their identification;
- Sign in (and out) to the visitors book with details of the time, their name, vehicle registration and a note of the purpose of their visit;
- Be escorted to the relevant person who they are visiting and handed over with their details. If the person is visiting a learner, their appointment time needs to be confirmed from the diary entry and if necessary by phone confirmation with a senior manager if it is a first time visit.

All learners are staff with a two-to-one ratio and interaction with maintenance staff and others is kept to a minimum and supervised closely. This is particularly relevant if work is being carried out a learner's bedroom. The Headteacher is responsible for all safeguarding with regard to visitors to the school.

Extended school and off-site arrangements

All offsite educational organisation is articulated through the **Potteries School Offsite Education Activities policy (updated 04/08/2025)**. Where extended school activities are provided by and managed by the school, this safeguarding and child protection policy and associated procedures

apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures. When our learners attend off-site activities, we will check that effective child protection arrangements are in place.

Risk Assessments

All risk assessments are organised using the **Potteries School Risk Assessment Policy (29/09/2025)**. Risk assessments will be carried out for any new activities undertaken as part of the school curriculum and for any off-site activities. Additionally, risk assessments will be undertaken when any learner joins the school to ensure compatibility and safety.

Photography and images

The vast majority of people who take or view photographs or videos of children/learners do so for entirely innocent, understandable and acceptable reasons. However, to protect learners the school and all its support staff will:

- seek permission from the Headteacher before taking photographs of staff and/or learners;
- seek individuals consent for photographs to be taken or published (for example, on our website or in newspapers or publications);
- seek parental consent;
- use only the learner's first name with an image;
- ensure that learners are appropriately dressed when photographed;
- encourage learners to tell us if they are worried about any photographs that are taken of them.

PART 2 Guidance and Procedures

Recognising abuse

To ensure that our learners are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child/learner by inflicting harm (for example by hitting them) or by failing to act to prevent harm (for example by leaving a small child home alone, or leaving knives or matches within reach of a vulnerable child/learner). There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child/learner. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child/learner, such as to cause severe and persistent adverse effects on the child/learner's emotional development. It may involve conveying to children/learners that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age – or developmentally - inappropriate expectations being imposed on children/learners. These may include interactions that are beyond the child/learner's developmental capability, as well as overprotection and

limitation of exploration and learning, or preventing the child/learner participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children/learners frequently to feel frightened or in danger, or the exploitation or corruption of children/learners. Some level of emotional abuse is involved in all types of maltreatment of a child/learner, although it may occur alone.

Sexual abuse

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

Neglect

Neglect is the persistent failure to meet a child/learner's basic physical and/or psychological needs and is likely to result in the serious impairment of the child/learner's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse, including "binge" drinking that results in foetal alcohol syndrome or smoking that results in fail to grow adequately. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-takers; or the failure to ensure access to appropriate medical care or treatment or to appropriate educational opportunities. It may also include neglect of, or unresponsiveness to, a child/learner's basic emotional needs.

Bullying

While bullying between learners is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying is thought to result in up to 12 child/learner suicides each year.

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. The subject of bullying will be addressed at regular intervals in the personal, social, health and citizenship education (PSHCE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the head teacher and the DSP will consider implementing child protection procedures.

Indicators of abuse and what you might see

The identification of signs of abuse is often complicated, as learners may go to great lengths to hide injuries, be ashamed or embarrassed, or be afraid of their abuser if threatened with violence or further abuse if they 'tell'. It is quite difficult for anyone without medical training to categorise physical injuries into accidental or deliberate with any degree of certainty.

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person. Remember, it is your responsibility to report your concerns. **It is not your responsibility to investigate or decide whether a learner has been abused.**

As examples a learner who is being or has been abused and/or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;

- be concerned about changing for PE or other activities;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss school or arrive late without real reason;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- make frequent excuses to leave lessons;
- misbehave more frequently to be removed from a lesson;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSP to decide how to proceed. It is very important that you report your concerns – you do not need 'absolute proof' that the learner is at risk.

The impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Notifying parents

The school will normally seek to discuss any concerns about a learner with their parents or person's with parental consent, especially where the concerns are about things that happen away from school. This must be handled sensitively and the Designated Safeguarding Person will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents/ person's with parental consent could increase the risk to the learner or exacerbate the problem, then advice will first be sought from children's social care.

Learners with sexually harmful behaviour

Learners may be harmed by other children or learners. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a learner's behaviour warrants a response under child protection rather than anti-bullying procedures.

In particular, all the learners in this school are adolescent boys with a history of social emotional and mental health needs (SEMH) history/ presenting harmful sexual behaviours. Research

suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18. It is imperative therefore that all staff are vigilant for signs of abuse at all times.

The management of children and learners with sexually harmful behaviour is complex and the school will work with other members of the integrated Branas Isaf team and relevant external agencies to maintain the safety of the whole school community. Learners who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the young and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the designated person, head teacher or Head of Education (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis. Child protection information will be stored and handled in line with Data Protection Act 1998 principles. Information is:

- processed for limited purposes;
- adequate, relevant and not excessive;
- accurate;
- kept no longer than necessary;
- processed in accordance with the data subject's rights;
- secure.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Child protection information will be stored separately from the learner's school file and the school file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that learners and parents do not have an automatic right to see them. If any member of staff receives a request from a learner or parent to see child protection records, they should refer the request to the Head Teacher.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a learner.

Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if the situation is an emergency and the Designated Safeguarding Person, I&A Services Designated Safeguarding Person and the Head of Education are all unavailable and they are convinced that a direct report is the only way to ensure the learner's safety.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online:

- All staff will undertake CSE training appropriate to their role;
- The school curriculum (where sexual relationships/PSE is delivered) will include relevant information around the risks associated with CSE.

Peer-on-peer abuse

Keeping Learners Safe states that 'Governing bodies and proprietors should ensure their child protection policy includes procedures to minimise the risk of peer on peer abuse and sets out how allegations of peer on peer abuse will be investigated and dealt with'.

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgment. If one child or learner causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a learner's behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the learners concerned; or ^[L]_[SEP]
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged learner. ^[L]_[SEP]

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

Prevention

As a school we will minimise the risk of allegations against other learners by:

- Providing a developmentally appropriate PSE syllabus which develops learner's understanding of acceptable behaviour and keeping themselves safe;
- Having a robust Online and Mobile Technology safety programme which develops learner's knowledge, understanding and skills to ensure personal safety and self protection when using the Internet;
- Having systems in place for any learner to raise concerns with staff knowing that they will be listened to, believed and valued;
- Developing robust risk assessments and providing targeted work for learners identified as being

a potential risk to other learners.

Allegations may be made against learners by other learners in the school that are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse, teenage relationship abuse and sexual exploitation, bullying, cyber bullying and sexting. It should be considered as a safeguarding allegation against a learner if some of the following features are present. The allegation:

- is made against an older learner and refers to their behaviour towards a younger learner or a more vulnerable learner;[SEP]
- is of a serious nature including a criminal offence;[SEP]
- raises risk factors for other learners in the school;[SEP]
- indicates that other learners may have been affected by this learner.

Procedure for dealing with allegations of peer-on-peer abuse

When an allegation is made by a learner against another learner, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the Designated Safeguarding Lead (DSL) should be informed.

- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances;[SEP]
- The Designated Safeguarding Lead will follow through the outcomes of the discussion and make a referral where appropriate;[SEP]
- If the allegation indicates that a potential criminal offence has taken place, the police will become involved;[SEP]
- Parents, of both the learners being complained about and the alleged victims will be informed and kept updated on the progress of the referral;
- The Designated Safeguarding Lead will make a record of the concern, the discussion and any outcome and keep a copy in the Secure Safeguarding Records;[SEP]
- If the allegation highlights a potential risk to the school and the learner, the school will follow the school's anti-bullying policy.

Bullying and cyber-bullying

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

The rapid development of, and widespread access to, technology has provided a new medium for 'virtual' bullying, which can occur in or outside school. Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience, and more accessories as people forward on content at a click. More detailed information and guidance is available in the school's anti-bullying policy.

Internet and eSafety

Mobile phones, computers and other digital devices can be a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm children. The harm may include sending hurtful or abusive texts and emails; enticing children to engage in sexually harmful conversations online; inappropriate/indecent webcam filming and photography or face-to-face meetings.

The school's **eSafety policy** is available on the website and are updated annually. These will explain how we try to keep learners safe in school when using the internet and mobile technology. Children and young people may unknowingly also engage in activities that could put themselves and others at risk, such as revealing personal information and uploading images of others. Online bullying by learners, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

- We will ensure that our learners are taught how to keep safe online through our curriculum
- School policies/measures will encourage good behaviour and respect (this includes around bullying);
- We have an anti-bullying / behaviour policy that links to online safety;
- We ensure policies take into account equality and diversity;
- We ensure policies relating to searching a student or their property with and without their consent are written correctly;
- We have an up to date home / school agreement regarding the use of social media to make complaints relating to learners / staff;
- We ensure we have the appropriate filters and monitoring systems in place that do not restrict what children can be taught in regard to online teaching and safeguarding.

School will use 'Teaching online safety in school (DfE 2019) to ensure teaching of online safety is age and developmentally appropriate as outlined the school's online safety policy.

Remote learning packages do not form part of the curriculum at the school as learners require high levels of supervision to be safe enough to learn. However, during the pandemic between 2020 – 2022 when the school was closed due to a number of cases across the staff team and learners, remote packages were offered. Here are the details from 'Pandemic Reflections' 2021:

In the event of school closure through WAG guidance or the instance of a positive test for either support staff or learners, the Headteacher will enact the school contingency plan (last updated 04/01/2021). The plan is very clear in the procedure for school closure and the details of responsibilities of all staff in the event of this occurrence. The Headteacher will then outline the resources available, the method of work delivery and the expectations of learners:

- *The local network infrastructure offers poor bandwidth and along with school computer access protocols (no internet access unless supervised directly by the Headteacher) mean that online remote learning is not currently an option for the school;*
- *Instead, a workbook for each learner will be emailed to the trainee manager every morning. Following completion, the work will then be scanned back for marking and evaluation;*
- *A Zoom meeting will be held with all learners on Monday and Friday to outline expectations, answer questions on the work and carry out pastoral work;*
- *An evaluation of the efficacy of the programme will be carried out every Friday and improvements incorporated as necessary. If we are able secure a more consistent broadband connection, then Google Classrooms may be an option for future weeks.*

Substance misuse

As part of the statutory duty on schools to promote learners' wellbeing, schools have a clear role to play in preventing drug misuse as part of their pastoral responsibilities. To support this, the Government's Drug Strategy 2010 ensures that school staff have the information, advice and power to:

- Provide accurate information on drugs and alcohol through education and targeted information, including via the FRANK service;
- Tackle problem behaviour in schools, with wider powers of search and confiscation;
- Work with local voluntary organisations, health partners, the police and others to prevent drug or alcohol misuse.

More guidance and advice for schools can be found from the link below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/270169/drug_advice_for_schools.pdf

Domestic abuse

The cross-government definition of domestic violence and abuse is:

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

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

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>
<http://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/>

Fabricated or induced illness

There are three main ways of the carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- **fabrication** of signs and symptoms. This may include fabrication of past medical history;
- **fabrication** of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents;
- **induction** of illness by a variety of means.

Carers behaviours associated with fabricated or induced illness

The following list is of behaviours exhibited by carers which can be associated with fabricating or inducing illness in a child. This list is not exhaustive and should be interpreted with an awareness of cultural behaviours and practices which can be mistakenly construed as abnormal behaviours:

- deliberately inducing symptoms in children by administering medication or other substances, by means of intentional transient airways obstruction or by interfering with the child's body so as to cause physical signs;
- interfering with treatments by over dosing with medication, not administering them or interfering with medical equipment such as infusion lines;
- claiming the child has symptoms which are unverifiable unless observed directly, such as pain, frequency of passing urine, vomiting or fits. These claims result in unnecessary investigations and treatments which may cause secondary physical problems;
- exaggerating symptoms which are unverifiable unless observed directly, causing professionals to undertake investigations and treatments which may be invasive, are unnecessary and therefore are harmful and possibly dangerous;
- obtaining specialist treatments or equipment for children who do not require them;
- alleging psychological illness in a child.

More information on fabricated or induced illness can be found using the following link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/277314/Safeguarding_Children_in_whom_illness_is_fabricated_or_induced.pdf

Female genital mutilation (FGM)

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Staff must inform the DSL if they have any concerns that a learner may be having FGM surgery in the future in the UK but also abroad. Staff should not examine learners. Warning signs for FGM can be found in the HM Government Multi-Agency Practice Guidance (link below), and pages 59-62 focuses on the role of schools and colleges. Pages 38-41 gives guidance on the warning signs that FGM may be about to take place or has already taken place.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800306/6-1914-HO-Multi_Agency_Statutory_Guidance.pdf

Gangs and youth violence

Youth violence is a serious public health problem and an [adverse childhood experience \(ACE\)](#) that can have long-term impact on health and wellbeing. Youth Violence is the intentional use of physical force or power to threaten or harm others by young people ages 10-24. It typically involves young people hurting peers who are unrelated to them and who they may or may not know well. Youth violence can include fighting, bullying, threats with weapons, and gang-related violence. A learner can be involved with youth violence as a victim, offender, or witness. Youth violence is connected to other forms of violence. Different forms of violence have common risk and protective factors, and victims of one form of violence are more likely to experience other forms of violence. Many risk factors for youth violence are linked to toxic stress from experiencing ACEs. Toxic stress (extended or prolonged stress), can negatively change the brain development of children and youth.

Parents, carers, family members and other adults in children's lives such as teachers have an incredibly important role to play in helping protect them from gangs and to keep them away from violence. But it can be difficult to know what to do.

Anyone worried about a child or learner involved in, or at risk from, gangs can call the NSPCC helpline on 0808 800 5000. Helpline practitioners have been trained as part of the Home Office Ending Gang and Youth Violence programme, and can offer advice, support and information on what action to take to help young people who are in, or at risk from, a gang.

More information and guidance on gangs and youth violence can be accessed using the link below:

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or learner (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Violence against women and girls (VAWG)

Violence against women and girls (VAWG) is the most widespread form of abuse worldwide, affecting one third of all women in their lifetime. VAWG limits progress towards the Millennium Development Goals (MDGs), violates women and girls' human rights and can have a negative impact on long-term peace and stability. In line with its international and national commitments, preventing VAWG is a top priority for the UK Government and DFID's Ministerial team. More information can be found using the link below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/318899/Education-guidance-note-partA.pdf

Mental health

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Prevention of radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

The Prevent Duty

All schools and colleges are subject to a duty under section 26 of the Counter-terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty: <https://www.gov.uk/government/publications/prevent-duty-guidance>

The department has published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support:

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

The school induction process for education support staff is carried out by the headteacher between weeks 3 – 4 of the onset of employment. All staff undertake the government led Prevent Duty Training as part of the induction and the school has the responsibility to ensure that all staff are kept updated with this legislation and how to implement the necessary protocols.

Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An

individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at:

(<https://www.gov.uk/government/publications/channel-guidance>).

The school Designated Safeguarding Lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Sexting

Sexting or sending nudes is when someone shares a sexual message, naked or semi-naked image, video or text message with another person. It doesn't have to be a nude image of them and could be an image of someone else. Young people can send nudes using phones, tablets and laptops and can share them across any app, site or game, including during a [livestream](#). Many young people also share them on social media channels. More information on sexting can be found from the link below:

<https://www.gov.uk/government/publications/sexting-in-schools-and-colleges>

Trafficking

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery, e.g. human trafficking, slavery, sexual and criminal exploitation, forced labour and domestic servitude. The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking'. Children do not need to give their consent to be referred to the NCA. Staff must be aware of the above and contact the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery.

Children Missing from Education, Home or Care

Any actions concerned with a learner missing from the home, school or other care setting must focus on promoting their welfare and must take account of their care or legal status, age, understanding and level of risk posed to the learner or others. If a learner is missing, the Registered Manager of the home and the Headteacher must be informed immediately so that they can plan a course of action that includes an assessment to determine the potential risks involved.

For the procedures necessary to enable the learner to be safe, please refer to **Greenfields: Absent, Missing Children/Young People.**

Behaviour Watch: online monitoring

BehaviourWatch allows teachers to efficiently reward positive behaviour, monitor safeguarding and carefully plan interventions to amend problematic learner conduct. The suite of tools available allows staff to immediately flag safeguarding concerns, inform the relevant agencies and proceed with investigation if appropriate. This application was introduced in July 2021 and is also used to monitor attendance and curriculum issues.

REVIEW

This policy and procedures will be reviewed and updated on an annual basis to ensure continued compliance with The Education (Independent Schools Standards) Regulations 2014, the

Independent School Standards (Wales) 2024 and relevant guidance issued by the DfE and Welsh Government.

This document will be next reviewed on 01/09/2027.

PART 3 Appendices

Code of ethical practice for school staff

All school staff are valued members of the school community. Everyone is expected to set and maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for learners.

All school staff should:

- place the safety and welfare of learners above all other considerations;
- treat all members of the school community, including learners, parents, colleagues, employees with consideration and respect;
- adhere to the principles and procedures contained in the policies in our school safeguarding portfolio and in teaching and learning policies;
- treat each learner as an individual and make adjustments to meet individual need;
- demonstrate a clear understanding of, and commitment to, non-discriminatory practice;
- recognise the power imbalances between learners and staff, and different levels of seniority of staff and ensure that power and authority are never misused;
- dress appropriately, avoiding any sexually suggestive wear;
- show respect for learners by arriving on time for all lessons/activities;
- show respect by preparing well-planned lessons and having all necessary resources available at the start of the lesson;
- use appropriate language and avoid any sexually suggestive or explicit phrases;
- understand that school staff are in a position of trust and that sexual relationships with a child, even over the age of 16, may be an offence;
- be alert to, and report appropriately, any behaviour that may indicate that a learner is at risk of harm;
- encourage all learners to reach their full potential;
- never condone inappropriate behaviour by learners or other staff;
- take responsibility for their own continuing professional development;
- refrain from any action that would bring the school or company into disrepute;
- value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice;
- Never use a personal mobile phone or personal account on social networking sites to contact or take or obtain photographs of any learner who attends or has attended the school. Equally never share your pictures and personal information with these learners.

Whistle blowing code

Purpose of this code

The school adheres to the CareTech 'Tell Us' Campaign whistle-blowing policy and procedures that enable staff to raise concerns relating to:

- poor / unprofessional practice;
- inappropriate conduct;
- crime;

- a miscarriage of justice;
- illegality;
- health and safety;
- environmental or property damage;
- unauthorised use of public funds;
- concealing or attempting to cover up any of the above.

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This code provides additional information to help staff to understand the role of whistle blowing in the context of poor practice and unacceptable conduct and attitudes towards learners.

When to use the code

The whistle blowing procedures and this code may be used by anyone employed by the school & Caretech in a paid or voluntary capacity who believes they have reason to suspect that the conduct of an employee towards a learner is inappropriate.

Inappropriate conduct includes, but is not confined to:

- bullying or humiliation;
- contravening health and safety guidelines;
- serious breaches of the school's code of ethical practice;
- professional practice that falls short of normally accepted standards;
- behaviour compromising students' welfare but in a way that does not meet the threshold; for child protection intervention.

Reasons for blowing the whistle

Staff will naturally be reticent to report a concern about the conduct of a colleague. However, each individual must take responsibility for ensuring that learners are fairly treated. If poor practice is allowed to continue unchecked, it could escalate with serious consequences.

Your action may not only protect learners, but also deter any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

Whistle blowing can also support the member of staff who is the subject of the concern. Their conduct may result from inexperience or lack of training that can be addressed by the school, or they may be under stress and be relieved when their conduct is questioned. Staff who deliberately fail learners and show no remorse or desire to improve are unlikely to welcome being exposed, but their conduct has to be confronted for the sake of the learner concerned and the reputation of the whole school.

Barriers to whistle blowing

You may worry that you have insufficient evidence to raise a concern and that you will set in train an unstoppable chain of events, that there will be adverse repercussions for your career, that you may suffer reprisals, harassment or victimisation, or that your suspicion or concern might be totally misplaced. These concerns are entirely understandable but you can be reassured that whistle blowing procedures addresses these issues.

The Public Interest Disclosure Act 1998 protects employees from reprisals for public interest whistle blowing. Your union, a solicitor or CareTech human resources department can provide you with information about your legal position.

Confidentiality and anonymity

All concerns are treated in confidence and, as far as possible, your identity will not be revealed if that is your wish. However, absolute confidentiality cannot be guaranteed if, as a result of an

investigation, you are required to provide a witness statement or attend a court hearing. You can, if you prefer, raise your concern anonymously. The school would need to decide whether the levity and credibility of the concern warrants investigation if the source of the concern, and the key evidence, is not readily available.

The school will fully support you and do all it can to protect you from any harassment or adverse repercussions that may arise from whistleblowing. Allegations that prove to be deliberately fabricated and malicious will be dealt with through staff disciplinary procedures. However, no action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

Reporting procedure

It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. One useful way to decide whether your concern should be reported is to consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was involved.

- You may raise your concern verbally or in writing. You should report your concern directly to the Head Teacher;
- If the Head Teacher is the subject of your concern, speak to the I&A Services Designated Safeguarding Person, CareTech Head of Education or contact the 'Tell Us' Campaign Hotline;
- A friend, colleague or union representative may accompany you to an initial meeting if you wish;
- Ensure the Head Teacher, Head of Service or Head of Education informs you of their proposed action and sets a date for a second meeting;
- Timescales will depend on the complexity of the initial inquiry but the case should not be allowed to stall and you should receive initial feedback within 10 working days. The timescale for subsequent feedback should then be agreed;
- Ask for clarification about confidentiality and ensure you have your wishes regarding the protection of your identity recorded.

Process and outcome

The Headteacher or chair will make enquiries to establish the facts of the matter and whether poor practice or inappropriate conduct has occurred. Members of the school community may be asked to provide information or advice.

- External advice, for example, from legal or human resources or children's services may be sought;
- A written record of the conduct, established facts and outcome of the inquiry will be kept;
- The whistleblower will be kept informed of the progress of the inquiry;
- The outcome of the inquiry will be one of the following;
- No poor practice or wrongdoing is established and the case is closed;
- The concern has some substance and the subject of the concern will receive advice and support from the head teacher to improve practice;
- Poor practice or wrongdoing is established and disciplinary proceedings are initiated;
- The concern is more serious and an investigation is initiated. This investigation may involve the local authority's legal team, children's social care or the police.

If, at any stage in the process, there is reason to believe that a learner is at risk of significant harm, children's social care will be immediately involved.

Further action

If you raise a concern and you are dissatisfied with the way it is managed, or the outcome, you may contact CareTech 'Tell Us' hotline for advice. Alternatively, you can seek advice from your union or professional association, a solicitor, the police, children's social care or Public Concern at Work (PCaW), a registered charity that offers free and confidential legal advice on workplace malpractice:

Public Concern at Work

3rd Floor, Bank Chambers, 6-10 Borough High Street, London SE1 9QQ

020 7404 6609

whistle@pcaw.co.uk

www.pcaw.co.uk

APPENDIX

THE POTTERIES (Home and School)

Joint strategy for managing peer-on-peer abuse

Rationale

Peer on peer abuse is defined as when a young person is exploited, bullied and/or harmed by peers who are of the same or a similar age. All young people directly involved with peer on peer abuse are under the age of 18 which defines the legal definition for a child in Wales. This conforms with the UN Convention of the Rights of the Child (1989) and Rights of Children and Young Persons Wales Measure (2011).

Keeping Learners Safe (2020) states that with regard to this 'Governing bodies and proprietors should ensure their safeguarding policy includes procedures to minimise the risk of peer on peer abuse and sets out how allegations of peer on peer abuse will be investigated and dealt with'.

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying or sexual experimentation. **This is a matter of professional judgment.** If one young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a learner's behaviour as abusive if:

- There is a large difference in power between the learners concerned;
- The perpetrator has repeatedly tried to harm one or more other children;
- There are concerns about the intention of the alleged learner.

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

Context

Professional experience supported by a theoretical framework show that young people who experience trauma, attachment and mental health difficulties make progress most effectively within an integrated care, education and therapeutic structure. The Potteries pursue this integrated approach of which the key tenets are:

- A shared set of defined underpinning values with regard to safeguarding children;
- A child-centred perspective as the engine for all practice;
- A consistent set of boundaries and structure regarding behaviour management;
- Working towards a common set of targets to assist young people to achieve;
- A multiagency-based approach for monitoring and evaluation of outcome.

Practice and prevention

As an integrated home and school, we will minimise the risk of peer-on-peer abuse by implementing safe working practices that involve:

- Pre-placement compatibility profiling at the referral stage to determine the potential for PoP abuse *before* placement and enrolment;
- Comprehensive multi-agency decision-making with regard to suitability of a young person matching the ethos and statutory registration requirements;
- A robust set of policies around safeguarding, anti-bullying, behaviour management and education support whose contents are embedded in practice;
- Precision risk assessment processing with individual young person's risk measured against others, the environment previous historical behaviours;
- Two-to-one supervision of all young people at all times across the provision allied with close monitoring of peer interaction;
- Embedded systems in place for young people to raise concerns with support staff knowing that they will be listened to, believed and valued;
- A robust online and mobile technology safety policy that means no Wi-Fi enabled devices are permitted in the home and that school usage is closely monitored by the headteacher;
- Ongoing and upgraded safeguarding training Level 3 for all support staff and frequent guidance sessions from the DSLs;
- Frequent needs and responses updates to ensure risk assessment process is accurate, contemporary and prescient with regard to the dangers of PoP abuse.

Procedure for dealing with allegations of peer-on-peer abuse

Allegations may be made against young people by other young people in the home/school that are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse, teenage relationship abuse and sexual exploitation, bullying, cyber bullying and sexting. It should be considered as a safeguarding allegation against a learner if some of the following features are present. The allegation:

- Is made against an older young person and refers to their behaviour towards a younger young person or a more vulnerable young person;
- Is of a serious nature including a criminal offence;
- Raises risk factors for other young people in the home/school.

When an allegation is made by a young person against another, support staff should report the concern immediately to the Designated Safeguarding Lead for the home (Luke Jarman) or the school (Andy Joynson) as detailed in the relevant safeguarding policies. The process to further this

is detailed below:

- A factual record should be made of the allegation and in the case of the school, an incident report compiled on BehaviourWatch;
- The Designated Safeguarding Leads will follow through the outcomes of any discussion and make a referral if appropriate;
- If the allegation indicates that a potential criminal offence has taken place, the police will be contacted;
- Those responsible for young people involved in the will be informed and kept updated on the progress of the referral;
- The Designated Safeguarding Leads will make the appropriate record of the concern, a record the discussion and relevant outcomes and store this securely;
- The time line from this point will follow the same procedure as a standard safeguarding referral.

This policy and procedures will be reviewed and updated on an annual basis to ensure continued compliance with the Independent School Standards (Wales) Regulations 2024 and relevant guidance issued by the DfE and Welsh Government.

This document will be next reviewed on 01/09/2027.