POLICY FOR SAFEGUARDING CHILDREN, YOUNG PERSONS AND VULNERABLE ADULTS

This policy has been drawn up with close reference to The Children Act 1989. 2004, The Education Act 2002, The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015, Keeping Children Safe in Education 2021 and the requirements of **Local Safeguarding Children and Adults Boards**.

The policy and its appendices detail Reflection Training Academy's safeguarding arrangements to ensure the safety and wellbeing of its learners and have been updated and amended to reflect the COVID-19 pandemic.

Senior Manager Divisional Prevent / Safeguarding (DSL)
Reflections Training Academy

This policy was considered and adopted by the following Directors:

Clare Barrett
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Policy Owner	Director sign off	Details of update	Date of Update	Version number
Jason Timms	Lucy Agnew	Policy review & update	29/06/20	14
Jason Timms	Lucy Agnew	Policy review & update	21/04/21	15
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Next review date: September 2022

1. Introduction

Reflections Training Academy are passionate about safeguarding our learners. "**Schools and Colleges and their staff form part of the wider safeguarding system for children**." **Working Together to Safeguard Children 2018**. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of learners at risk of harm under our duty of care, but also a moral duty, providing a safe environment where learners can learn, flourish and succeed. This policy and its appendices focus on how we recruit and train our staff, preventing unsuitable people from working with our learners through adherence to safe recruitment procedures, deal effectively with allegations against staff and safeguarding support for our learners. The policy will contribute to the protection, safeguarding and promote welfare by:

- Clarifying standards of behaviour for staff and learners
- Promotion of an ethos that promotes mutual respect and shared values and a robust culture of vigilance
- Including safeguarding in a robust pastoral system to enable learners to keep themselves and others safe
- Preventing the impairment of Learners mental and physical health or development
- Addressing concerns at the earliest possible stage to protect learners from maltreatment and/or abuse
- Supporting those who have been abused, are vulnerable to abuse or who have witnessed violence
- Enabling the development of knowledge and skills to understand risk with the provision of appropriate and effective care
- Ensuring that everyone who comes into contact with learners understands their role in identifying concerns, sharing information and taking prompt action
- Ensuring that online safety is promoted within the Academy's infrastructure through the use of filters and monitoring systems and is an integral part of pastoral and training programmes through training and understanding of what must be followed

In Keeping Children Safe in Education (KCSiE) 2021 reference is made to "children and young people". The term is used to mean those under the age of 18 years old or 25 if they are considered at risk; for example, learners with learning disabilities, those in Care or previously in care, those with an EHCP and those with mental health concerns. Throughout this policy and safeguarding procedures, these will be identified as learners

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes. "Adults at risk". An adult at risk of abuse or neglect is defined as 'someone who has needs for care and support, who is experiencing or at risk of, abuse or neglect and as a result of their needs - is unable to protect themselves (Care Act 2014) All Reflections safeguarding procedures will be applied with appropriate adaptations to all learners.

2. Responsibilities for Safeguarding

'**Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.'**
(KCSiE 2021)

We all have a statutory duty to safeguard and promote the welfare of Learners and to maintain the attitude of 'it could happen here' where safeguarding is concerned and demonstrate professional curiosity to ascertain a learner's circumstances.

All staff should:

- Report concerns and recognise the importance of raising all concerns and not see any as insignificant. It needs to be understood that abuse and maltreatment can be complex and may not be evident in one concern but in a picture built up over time through the consistent reporting of concerns. This is particularly evident in cases of emotional abuse and neglect. It is crucial that information is passed on to the DSL's without delay to enable support to be accessed at the earliest opportunity.
- Be aware of the indicators of abuse and neglect to enable the identification of those children who require help or protection
- Be aware that safeguarding incidents and/or behaviours can be associated with factors outside the training academy and/or can occur between learners outside of these environments.
- Consider the risk to learners of abuse and exploitation in situations outside their families including child criminal exploitation, child sexual exploitation, and serious youth violence
- Staff conduct themselves in line with Appendix 2 – Staff Safeguarding Code of Conduct

Senior Manager Divisional Prevent / Safeguarding (DSL) is the Designated Safeguarding Lead with lead responsibility and oversight of all divisional safeguarding arrangements, to keep all divisional Academy Safeguarding policies and procedures update and to keep Academy Personal up to date of changes to policies & procedures and safeguarding legislation via inductions, staff briefings and training sessions and within the Birmingham* Academy building with responsibilities for the examining of, and reporting of allegations of abuse to the relevant authority. The DSL will also act as the Birmingham Designated person for looked after children and care leavers.

Pastoral Support/Safeguarding Officer is the **DSL** with responsibilities for safeguarding arrangements, to keep Academy Safeguarding policies and procedures update and to keep Academy Personal up to date of changes to policies & procedures and safeguarding legislation via inductions, staff briefings and training sessions and within the Bristol* Academy building with responsibilities for the examining of and reporting of allegations of abuse to the relevant authority. The DSL will also act as the Bristol Designated person for looked after children and care leavers.

Directors are responsible for oversight of the DSL's and will monitor safeguarding performance, policy, procedures, processes and systems monthly

Tutor / Assessors and Skills Support Tutors are responsible for reporting any disclosures or suspicions of abuse to the DSL in line with the academy reporting process in appendix 1. Conducting themselves in a manner to not give rise to an allegation of abuse, this includes but is not limited to socialising with learners, holding personal contact details of learners (e.g. mobile phone numbers) for own personal use, unnecessary physical contact, inappropriate language or conversation in line with staff safeguarding code of conduct. Tutor/Assessors are responsible for supporting the DSL's in the delivery, and monitoring support of safeguarding to the learners under their duty of care.

the DSL's will deputise for each other when one is not on site (for example annual leave)

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3. Safe Recruitment & Selection

Reflections pay full regard to KCSiE 2021 and all recruitment will include reference to Reflections commitment to safeguarding and promoting the wellbeing of learners. All staff employed by Reflections Training Academies who have direct access to learners and are fully competent within sector areas and required professional qualifications go through a rigorous recruitment procedure as detailed in **The Staff Safe Recruitment Procedure -Appendix 3**, which includes an Enhanced Level Disclosure and Barring Service (DBS) check and two references. Evidence of these checks are recorded on our electronic Single Central Record SENTRY. Other safe recruitment areas recorded and evidenced within SENTRY include the right to work in the UK, identity, Overseas Checks, DBS update service status change and fitness to carry out role checks.

Any volunteers/contractors/ agency staff who will have access to learners or learner information will be subject to a risk assessment process to determine the need to provide evidence of, or requirement to carry out DBS check before carrying out any activity/contract with the training academy. Any visiting tutor will be subject to a Visiting tutor / external speaker process and will be required to sign and commit to the visiting tutor / external speaker agreement.

Governors are inducted and agree to terms of reference on being appointed to the Governance board inclusive of safeguarding commitments to the role.

4. Staff Training

'It is Essential That everybody working in a school or college understands their safeguarding responsibilities' (Keeping Children Safe in Education 2021)

We have robust safeguarding training for all staff.

- There are comprehensive induction processes and schedules for all team members where all required documents and policies including part A KCSiE are provided both at induction of new staff, and on a yearly refresher basis or as change dictates for current staff. To ensure Team members have fully read and understood these documents and policies team members will confirm receipt and understanding of documents and policies via MyConcern.
- All staff receive safeguarding CPD training to meet and exceed in KCSIE 2021 and also receive regular updates through team meetings, to develop and support effective safeguarding practice.
- Both DSL's have undergone external DSL training which is refreshed every 2 years. DSL's continually attend safeguarding and pastoral support CPD workshops throughout the year and both DSL's are subscribed to Birmingham Education Support services and attend a wide range of local authority safeguarding development workshops to ensure the knowledge base is current with local safeguarding. Further knowledge and understanding is gained from AELP sector-specific workshops, regular email newsletters form specialist safeguarding organisations and experts and MyConcern webinars

5. Safeguarding Learners

Reflections Training believe that:
- All Learners have the right to be protected from harm, abuse and neglect;
- Every Learner has the right to an education and Learners need to be safe and feel safe in training;
- Learners need support that meets their individual needs, including those who may have experienced abuse;

- All Learners have the right to express their views, feelings and wishes and voice their own values and beliefs;
- All Learners should be encouraged to respect each other's values and support each other;
- all Learners have the right to be supported to meet their emotional and social needs as well as their educational needs as this will promote educational achievement;
- Reflections will support the prevention of abuse, victimization, bullying (including homophobic, bi-phobic, trans-phobic and cyberbullying), exploitation, serious youth violence, radicalisation, extreme behaviours, discriminatory views and risk-taking behaviours with its learners through awareness-raising workshops, dedicated safeguarding padlets, robust concern reporting system as well as pastoral and wellbeing support.

This Policy will contribute to learner support by;
- Identifying and protecting the vulnerable
- Early identification of needs and planning to address those needs.
- Reviewing and assessing the effectiveness of any plans of support agreed and amended to meet changing needs
- Dedicated learner wellbeing resources such as What Up Safeguarding Virtual Walls

This policy will contribute to the protection of learners by;
- Implementing Safeguarding policies and procedures and working in full and transparent partnership with learners, employers, parents/carers and other agencies
- Raising staff knowledge and understanding of the risks and vulnerabilities faced by learners, embedding safeguarding through effective communication and following continuous professional development policy to promote understanding that no single professional can have the full understanding of young persons or vulnerable adults needs and circumstances
- Developing learner awareness of safeguarding risks and vulnerabilities
- Encouraging learners to participate within an ethos of transparency and to have a voice and feel listened to inclusive of pre-review, learner forums and surveys carried out.

6. Identifying Safeguarding Concerns

There are several stages where a safeguarding concern can be identified during the learner journey

- During the recruitment process – CRM application form question and verbal questioning over any existing safeguarding needs. Disclosure on the Individual Learner Record LLDD field, Disclosure of or receipt of EHCP, referrals from external agencies such Youth offending, social workers, SENAR, care home etc.
- Induction Processes – all learners undergo a private & confidential 1-2-1 pen portrait inclusive of Safeguarding / pastoral support needs and barriers to learning.
- Liaison with prior education provider DSL team over historic Safeguarding files
- Receipt of transferred safeguarding file from prior Education provider
- Individual support plan meetings with learner and parent/carer (Study Programmes & Traineeships)
- Disclosure by a learner or employer via website concern form
- On programme by staff identification or learner/employer /parent disclosure.
- Regular on-programme reviews inclusive of confidential pre-review with safeguarding support questioning.
- Learners exiting programme inclusive of exit questionnaire with safeguarding section.

7. Reporting a concern about a learner

All staff have equal responsibility to report their concerns about a learner or the behaviour of any adult without delay to the DSL via MyConcern as detailed in Appendix 1. Whilst the DSL or deputies will normally make referrals, any staff member can refer their concerns to relevant agencies directly in emergencies.

Learners, parent/carers and employers can report a concern directly to the safeguarding team via phone, email to safeguarding@reflectionstraining.co.uk or via the concern contact form at https://www.reflectionstraining.co.uk/safeguarding/

Everyone has a responsibility to escalate their concerns and 'press for reconsideration if they believe a Learners' needs further exploration;
Key Staff will work in partnership with other agencies to promote the welfare of young people and protect them from harm, including the need to share information to safeguard them in line with information sharing guidelines;

8. Managing Concerns about learners

On receipt of MyConcern email alert of concern received the DSL will review the concern and allocate the appropriate Level of Need to the learner Profile on MyConcern in line with Appendix 1

- The managing any support for the Learner internally via the Academy's pastoral support processes;
- Referral to an outside support agency;
- A referral for statutory services, for example, social services, medical services or police as the learner might be in need, is in need or suffering or likely to suffer harm.

All concerns of sexual violence referred to the Local Authority and/or the police or Prevent referrals to Chanel must also be notified to the ESFA via the Contact Form: General enquires at https://form.education.gov.uk/en/AchieveForms/?form_uri=sandbox-publish://AF-Process-f9f4f5a1-936f-448b-bbeb-9dcdd595f468/AF-Stage-8aa41278-3cdd-45a3-ad87-80cbffb8b992/definition.json&redirectlink=%2Fen&cancelRedirectLink=%2Fen&consentMessage=yes

9. Allegations against other Learners (Peer on Peer Abuse)

All Learners have the right to be protected from harm and abuse including from their peers. Peer on peer abuse can take many forms as detailed in section 17 but includes peer on peer sexual violence or sexual harassment.
Learners can privately and confidentially disclose any form of abuse via the Academy 'If in Doubt Shout' reporting system directly to the safeguarding team or by emailing safeguarding@reflectionstraining.co.uk . Any disclosures will be recorded on MyConcern.
All instances of peer on peer abuse will be investigated fully and sensitively by the DSL's taking into account the wishes of the victim viewing all available evidence. The investigation will take into account

- The nature of the alleged abuse including whether a crime has been committed
- Any power imbalance, for example is alleged perpetrator older, or victim have a vulnerability
- Are there any ongoing risk to the victim or others (learners, team members, siblings)
- Any links to other issues such as CSE, gangs, drug usage etc.

The victim will be interviewed and a statement taken along with any witnesses. Statements along with any other evidence (photos*, Body Map, text messages, emails etc) will be logged on MyConcern.

Any youth-produced sexual imagery or any media that may include illegal images of an under 18-year-old are not to viewed by team members or forwarded or uploaded to MyConcern. Any images of this type must only be viewed by the police.

The internal investigation may lead to a number of conclusions:

- There are grounds that the allegation may be or is true. The appropriate proportional action to be taken (as listed below)
- The alleged perpetrator has acted inappropriately but it does not require social care or police action. The action was in breach of Academy rules and to be either managed internally with the academy disciplinary process or identified early help.
- The alleged perpetrator has acted outside expected Academy standards of conduct but it is not a safeguarding issue. The action lay outside the bounds of Academy rules so the perpetrator will be managed internally with the Academy disciplinary process
- There is no basis for the allegation or suspicion. No further action is to be taken under these procedures. If a report or accusation is determined to be unsubstantiated, unfounded, false or malicious then consideration should be given whether the person who made the allegation is in need of early help or managed internally with the Academy disciplinary process

Actions to be taken

- **Manage internally** – for incidents not meeting reporting thresholds
- **Early Help –** where referral to statutory services not required but learners involved may benefit from early help
- **Referral to Children's services –** when an under 18 has been harmed, at risk of harm or is in immediate danger
- **Referral to police –** usually in parallel with above referral or if over 18 has been harmed, at risk of harm or is in immediate danger

All outcomes and conclusions will be recorded within the MyConcern report of the incident, and where identified case closed.

A dedicated NSPCC helpline 0800 136 663 is also available to support anyone who has experienced sexual abuse in educational settings or has concerns about someone.

10. Safeguarding Allegations against staff

When examining an allegation, care must be taken to ask only enough questions to get the basic facts and not to form any sort of investigation that may prejudice the investigating authority, taking care to avoid any leading questions. It must be established if the allegation / concern meets the harm threshold and the team member has
- Behaved in a way that has harmed a child, or may have harmed a child and / or;
- Possibly committed a criminal offence against or related to a child and / or;
- Behave towards a child or children in a way that indicates he or she may pose a risk of harm to children and /or;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (inclusive of behaviour that may have happened outside of training that might make an individual unsuitable to work with children also known as a transferable risk)

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The DSL or investigating officer should discuss the case with the LADO, the nature, content and context of the allegation / concern and agree a course of action

This examination may lead to a number of conclusions:

- There are grounds that the allegation / concern may be true and meet the harms threshold. This must be reported to the local safeguarding team and/or social services department within one working day.
- There are grounds that the allegation / concern may be true and does not meet the harms threshold. The allegation will be investigated internally and managed via company policies
- A staff member has acted inappropriately but it is not a safeguarding issue. The action was in breach of company rules and disciplinary action and/or training may be needed.
- A staff member has acted inappropriately but it is not a safeguarding issue. The action taken lays within the bounds of company rules and therefore there is a need to review policies and procedures.
- There is no basis for the allegation or suspicion. No further action is to be taken under these procedures. The decision and justification for it must be recorded on the case report. If a report or accusation is determined to be unsubstantiated, unfounded, false or malicious then consideration should be given whether the person who made the allegation is in need of early help or managed internally with the Academy disciplinary process

All allegations of abuse made against a staff member must be notified to the ESFA via the Contact Form: General enquires hyperlinked in section 8

11. Whistleblowing

All staff should be aware as well as their duty to raise and report safeguarding concerns, there is also the duty to report where concerns are present about the attitude, conduct or actions of colleagues who abuse their position of trust in line with the Staff Safeguarding Code of Conduct (Appendix 2).
Any such concerns should be raised in the strictest confidence to the DSL in person, by phone 07500668567 or email jason@reflectionstraining.co.uk. Whistleblowing concerns about Safeguarding Leads should be raised to the relevant academy director and concerns about Directors should be raised with the DSL who will liaise with the Company Managing Director.
This procedure is designed to encourage openness and aims to allow staff and learners to report any safeguarding wrongdoing or raise issues that concern them that affect the welfare and safety of young people without fear of possible consequences or victimisation. There is a statutory duty of an employee to raise such concerns and no detriment will be suffered provided that the employee is acting in good faith. For circumstances where these normal reporting lines cannot be followed then, concerns can be reported to the NSPCC whistleblowing advice line on 0800 028 0285 or help@nspcc.org.uk

12. Missing from Education

Attendance to training is closely monitored at all times. Any learners that persistently go missing from training or have been missing from training for an extended period will be actioned in line with the 4 step process within the Attendance & Punctuality Policy. If any safeguarding area of concern is identified during this process a MyConcern report will be raised and managed is line with sections 7 and 8.
Any learners who are on the Safeguarding Risk register who persistently go missing from training or have been missing from training for an extended period will be contacted and

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followed up by the safeguarding team. If contact is difficult to make, then the individuals employer or emergency contacts recorded within the learner pen portrait will be contacted to establish whereabouts and wellbeing of learner.

13. Safeguarding at Work Placements

All employer partners are inducted to Safeguarding of learners during initial and annual H&S checks. Placement employers are inducted to and sign to commit to a safeguarding statement for employer and work placements and are issued a guidance document alongside the 'If in Doubt, Shout' contacts.

Where a learner attends a work experience placement as part of their programme (such as Study Programmes & Traineeships) then the work placement will be subject to an additional Health & Safety vetting visit that includes Safeguarding elements. Safeguarding issues and procedures will be discussed with placement owners/supervisors and information handed out. A contract for training is then discussed and signed by the work placement and a Reflections representative. The contract contains clauses for safeguarding including the procedure for how employers can report any safeguarding issue that should arise.
All learners undergo a regular 3-way (assessor, employer and learner) face to face or virtual review process which includes safeguarding/welfare.

14. Multi-Agency Working

We work in partnership with other agencies to promote the best interests of our young people as a top priority in all decisions and actions that affect them. Reflections will, where necessary, liaise with these agencies and make requests for support from the applicable Local Authority first response teams (listed at the end of this policy). These requests will be made by the DSL. Where the young person already has a safeguarding Social Worker or Family Support Worker, the request for support should go immediately to the team involved, or in their absence to their team manager.
When invited the DSL will participate in any MASH strategy meeting, usually by conference phone, adding any held data and intelligence to the discussion so that the best interests of the young person are met.
We will co-operate with any Child Protection enquiries conducted by local authorities and will ensure representation at appropriate inter-agency meetings such as Our Family Plan, Children in Need, Initial and Review Child Protection Conferences, and Core Group meetings. We will provide reports as required for these meetings.
Where a learner is subject to an inter-agency Child Protection Plan or a multi-agency risk assessment conference (MARAC) meeting, we will contribute to the preparation, implementation and review of the plan as appropriate.
Reflections work in liaison with agencies that support learners who may have vulnerabilities due to SEND or LAC attending and contributing all required meetings in supporting the learners needs and vulnerabilities.

15. Data Sharing & Confidentiality

The Academy will follow the guidance document '**Information Sharing: advice for practitioners providing safeguarding services'** (DfE, 2018) and the Company Data Protection Policy. KCSiE (2021) p29, para 110 states that 'the Data Protection Act 2018 and UK-GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of the children.
Where a referral is made to an outside agency for support outside of the statutory requirements, then this will only be done with permission from the learner to carry out the referral and disclose their personal information.

The DSL will ensure that a learner's Safeguarding file is transferred to a different educational setting should they move on and the process for doing this is either by electronic MyConcern transfer to the educational settings MyConcern system or print out of MyConcern audit trail and uploaded evidence and post by recorded delivery marked Private & Confidential FAO the settings DSL

16. Governance Responsibilities

The Reflections Training Governance board abide by their responsibilities as outlined in KCSiE 2021. Governors also have specific responsibility for ensuring that the Academy monitors the impact of its work and learns lessons from its safeguarding concerns. As stated in KCSiE 2021, "Governing bodies should ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare".

The Governance Board ensures that the Academy:
- Provides a safe environment for learners at risk of harm to learn in.
- Identify those who are suffering or are likely to suffer significant harm or who are at risk of radicalisation.
- Take appropriate action to see that learners are kept safe at training and also that disclosures of potential abuse occurring at home or elsewhere are reported appropriately.
- Refer concerns that a learner at risk of significant harm or might be at risk of significant harm to the appropriate referral agencies.
- Work effectively with others as required by "Working Together to Safeguard Children".
- Listen to the voice of the learner and always act in the interest of the learner.

Governors receive suitable training to familiarise them with our safeguarding policies and procedures and their safeguarding roles and responsibilities. Governors will receive annual KCSiE and safeguarding policy training in line with updates.

A Nominated Governor for Safeguarding will be allocated. The role is strategic rather than operational – they will not be involved in concerns about individual learners. The nominated governor will receive training relevant to the governance role and this will be updated as required.

17. Online Safety

We use content filtering on all in-house learner accessible IT systems which are in place for the safety of all of our learners. This monitors, flags, and blocks access to websites that are blacklisted or considered to be dangerous, harmful or contain inappropriate content. Lanschool monitoring software is in place on learner servers, alerting to keystrokes, keywords and inappropriate access. The monitoring and content filtering systems are monitored by the IT team who alert the safeguarding team to any alerts. These are then dealt with under normal safeguarding processes and logged via MyConcern.

There is a recognition that most learners are using data on their phones, this means that not only must staff think about filtering and monitoring within the Academy IT infrastructure, they also need to be vigilant to Learners accessing the internet whilst they're at Academy locations.

Our Learner Acceptable Use of Technology Policy Agreement states the importance of being safe online, our fulfilment to the Prevent Duty, what our IT equipment is allowed to be used for and what is unacceptable. Any unacceptable use of IT will be handled in line with the conduct and behaviour policies.

The use of technologies impacting safeguarding are monitored and risky or inappropriate behaviours with technology are raised as safeguarding concerns.

For all remote and online delivery, all staff & Learners are required to follow the Remote & Online Learner conducts and requirements in Appendix 5
All team members and learners are inducted to online safety and the online dangers of content, conduct, contact and commerce.

17. Types of Abuse and Neglect

To ensure that our learners are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. All Academy staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse: a form of maltreatment of a Learner. Somebody may abuse or neglect a learner by inflicting harm, or by failing to act to prevent harm. Learners may be abused in a family or an institutional or community setting by those known to them or more rarely, by others (for example via the internet). They may be abused by an adult or adults or another learner.

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

Emotional Abuse: Emotional abuse is the persistent emotional maltreatment of a child or adult at risk of harm such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying) causing learners frequently to feel frightened or in danger or the exploitation or corruption of learners. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse: Sexual abuse involves forcing or enticing a child, young person or adult at risk of harm to take part in sexual activities. It may not necessarily involve a high level of violence, whether or not the child or adult may not be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities such as involving children in looking at or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (see Peer on Peer Abuse).

Neglect: 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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

It may also be neglect of or unresponsiveness to a child's basic emotional needs. This also applies to adults at risk of harm for whom neglect is an often under-reported or unchallenged concern.

Forced Marriage: This involves a young person or adult at risk of harm being forced into a marriage against their will

Child Criminal Exploitation CCE): Child criminal exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity a) in exchange for something the victim needs or wants, and/or b) for the financial or other advantages of the perpetrator or facilitator and/or c) through violence or threat of violence. 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.

Child Sexual Exploitation (CSE): CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity
   a) in exchange for something the victim needs or wants, and/or
   b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child's or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). CSE can take a number of forms and Barnardo's has identified three areas:

- Inappropriate relationships involving a lone perpetrator who has inappropriate power or control over a young person, whether physical (including domestic abuse), emotional or economic. There is likely to be a significant age gap between the perpetrator and victim. The young person may believe that they are in a loving, equal relationship.
- The 'boyfriend' model of exploitation and peer exploitation – the perpetrator befriends and grooms a young person into a 'relationship' and subsequently coerces them to have sex with friends or associates. This includes gang exploitation and peer-on-peer exploitation.
- Elements of organised / networked sexual exploitation or trafficking – young people are passed through networks of offenders, possibly between towns and cities, where they may be coerced into sexual activity with multiple men. Victims may also be used as agents to recruit other children and young people. Where there are groups of offenders in a network, these should be considered as Organised Crime Groups (OCGs).

County Lines: This is a term used to describe gangs and organized criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other forms of 'deal line'. Exploitation is an integral part of the county lines offending model with children and

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vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions. Pupil referral units, special educational needs schools, children's homes and care homes. Children are recruited to move drugs between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Any concerns regarding the above will be reported in line with local authority procedures and staff will recognise that learners are victims and should be supported as such.

Domestic Violence: The cross-government definition of domestic violence and abuse is "any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old 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 the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim".

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Reflections recognise that exposure to domestic abuse and/or violence can have serious long term emotional and psychological impacts upon learners. We will work with key partners and share information where there are concerns that domestic abuse may be an issue for a learner or be placing a learner at risk of harm

Female Genital Mutilation: This comprises all procedures that involve partial or removal of the external female genitalia or other injuries to female genital organs for non-medical reasons. FGM is an extremely harmful practice and is illegal in the UK. Despite being an embedded practice in some cultures, FGM is not a matter which can be decided by personal preference.

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon staff to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for staff to see visual evidence and they should not be examining learners, but the same definition of what is meant by "discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

We will follow our mandatory duty to report disclosures on FGM about a female under the age of 18 to the police.

 Honour-based abuse: encompasses crimes that have been committed to protect or defend the honour of the family and/or the community and can include multiple perpetrators, including Female Genital Mutilation (FGM), forced marriage and practices such as breast

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ironing. All forms of so-called HBV are abuse (regardless of motivation) and should be handled and escalated as such.

Peer on Peer Abuse: All staff should be aware that children can abuse other children (often referred to as peer on peer abuse) and recently highlighted within Education by the Everyone's Invited movement. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element that facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent such as forcing some to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals, underwear or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Sexting* (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals

Team members are not to view any type of youth-produced sexual imagery or any media that may include illegal images of an under 18-year-old under any circumstances

Radicalisation: Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to Channel which is a multi-agency panel that offer guidance and support with the aim of preventing activity that could be deemed as criminal. Terrorism is an action that endangers or causes serious violence to a person /people; causes serious property damage, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
Extremism goes beyond terrorism and is defined in the Government Counter-Extremism Strategy as vocal or active opposition to fundamental British values including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. The calls for the death of armed forces are also considered extremism. Staff will be alert to changes in behaviour which may indicate that they require protection.

Financial and Material Abuse: This applies l to anyone at risk of harm and relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse or misappropriation of property, possessions or benefits.

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 can have a disastrous effect on a learners wellbeing and in very rare cases has been a feature in the suicide of some young people. Bullying someone because of their age, race, gender, sexual orientation disability and/or transgender will not be tolerated as the Academy operates a zero-tolerance approach. Bullying can take many forms and includes:

- **Emotional**:   Being excluded, tormented (e.g. hiding things, threatening gestures)
- **Physical**:   Pushing kicking, punching or any use of aggression and intimidation.
- **Racial:**   Racial taunts, use of racial symbols, graffiti, gestures.

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- **Sexual:** Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.
- **Verbal:** Name-calling, spreading rumours, teasing.
- **Cyber:** All areas on the internet, such as email and internet, chat room misuse, mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting.

18. Academy Values

In applying this policy Reflections will apply its core values of Care, Passion, Professionalism, Quality and Image at all times.

- **Care** – for learner's safety and welfare
- **Passion** - to provide a safe and secure environment where learners can learn, flourish and succeed
- **Quality** – of the welfare and support demonstrated to the learner at all times
- **Professionalism** – the way we conduct ourselves in meeting and exceeding learners wellbeing and support needs
- **Image** – clearly displaying welfare and support throughout Academy Buildings. Learner friendly resources to support welfare.

19. Glossary of Terms

Care Act 2014 - This is a reformed law that related to the support and care for carers and adults. This act came into force in April 2015. Clauses 42-45 of this Act gives the statutory framework for protecting adults from abuse and neglect.
DBS - Disclosure and Barring Service. The DBS is a governmental body that was established in 2012 that carry Criminal records checks
DfE – Department for Education
DSL -   Designated Safeguarding Lead
UK-GDPR – United Kingdom -General Data Protection Regulation. Post Brexit UK adoption of EU Law on data protection and privacy for all individuals
HBV – Honour Based Violence
KCSiE – Keeping Children Safe in Education – DfE publication updated annually
LAC – Looked after Child
LADO –Local Authority Designated Officer works within Children's Services and gives advice and guidance to employers, organisations and other individuals who have concerns about children and young people.
LSCB – Local Safeguarding Children Board. Every local authority has its own Local Safeguarding Children Board. The Local Safeguarding Children Board operates on a multi-agency level and is often the first point of contact for any non-emergency safeguarding concerns
MARAC - is short for Multi-Agency Risk Assessment Conference and is a multi-agency forum of organisations. These organisations manage high-risk cases of honour-based violence, stalking and domestic abuse.
MASH –Multi-Agency Safeguarding Hub. This service is made up of Police, Adult Services, NHS and other organisations. MASH helps agencies to act quickly in a coordinated and consistent way. This means that the person at risk is kept safe
SEND – Special Education Need or Disability

20. Local Authority LADO's

West Midlands

Authority Area	LADO Name	Contact number	Contact email	address
Birmingham	LADO Team	0121 675 1669	Ladoteam@birminghamchildrenstrust.co.uk	PO Box 17340 BIRMINGHAM B2 2DR
Solihull	Simon Stubbs	0121 788 4310	cpru@solihull.gcsx.gov.uk (put 'LADO referral' in the subject line)	Child Protection and Review Unit Bluebell Centre Chelmsley Wood B37 5TN
Walsall		0300 555 2866 Evenings, weekends, bank holidays (out of hours) 0300 555 2922	mash@walsall.gcsx.gov.uk	Walsall Safeguarding Children Board The Council House Room 27 Lichfield Street Walsall, WS1 1TW
Worcestershire	Jon Hancock James Borland	01905 843311 01905 846383	socialcare@worcestershire.gov.uk	Social Services, PO Box 585, Worcester WR4 4AD
Sandwell	Lisa Burn	0121 569 4770	lscb_sandwell@sandwell.gov.uk	Metsec Buildings, Ground Floor, Broadwell Road, Oldbury, B69 4HE
Dudley		0300 555 0050 during office hours (9am - 5pm). Out of office hours 0300 555 8574	SPA_Team@Dudley.gcsx.gov.uk	Council House Priory Road Dudley DY1 1HF

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Coventry		024 7683 3443	LADO@coventry.gcsx.gov.uk	*Broadgate House Broadgate, Coventry CV1 1FS*
Herefordshire	Paul Rooney	01432 260680	lado@herefordshire.gcsx.gov.uk	Council Offices, Plough Lane Hereford, HR4 0LE
Shropshire		0345 678 9021. Out of office hours 0345 6789040.	sscb@shropshire.gov.uk	Shropshire Council Room GN94, Ground Floor Shirehall Abbey Foregate Shrewsbury SY2 6ND
Telford & Wrekin	Wendy Chetta	01952 385385 Monday - Friday 9am - 5pm 01952 676500 Monday - Sunday After 5pm		Addenbrooke House, Ironmasters Way, Telford, TF3 4NT
Wolverhampton	Paul Cooper	01902 550661	paul.cooper@wolverhampton.gcsx.gov.uk	Priory Green Building Whitburn Close Pendeford Wolverhampton WV9 5NJ
Staffordshire	First Response Team	Freephone: 0800 1313 126 (Monday to Thursday, 8.30am to 5pm and Friday 8.30am to 4.30pm) In an emergency outside office hours telephone 0845 6042 886	FirstR@staffordshire.gov.uk	Staffordshire Safeguarding Children Board Wedgwood Building Tipping Street Stafford ST16 2DH

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South West Area

Authority Area	LADO Name	Contact number	Contact email	address
Bristol	Bristol Safeguarding Board First Response	01179036444 Emergency response team 01454615165	https://bristolsafeguarding.org/children-home/contact/report-a-concern/	BSCB Safeguarding (CH) PO Box 3176 Bristol, BS3 9FS
Bath and North East Somerset	LADO	01225 396312/ 01225 396313		Child Protection Unit Bath & North East Somerset Council, Lewis House, Manvers Street, Bath, BA1 1JG
South Gloucestershire	South Gloucestershire Safeguarding Children/Adults Board	Children: 01454 866000 Adults: 01454 868007 Emergency: 01454 615165		
North Somerset	North Somerset Single Point Access	01275 888 808 - Monday to Friday, 8am - 6pm 01454 615 165 - Out of hours and at weekends	Email for Independent chair: tony.oliver@n-somerset.gov.uk http://www.northsomersetsafeguarding.co.uk/contact	
Wiltshire:	Wiltshire Multi-Agency Safeguarding Hub (Mash)	0300 4560108	mash@wiltshire.gcsx.gov.uk	Multi-agency Safeguarding Hub (MASH) County Hall Bythesea Road Trowbridge, Wiltshire BA14 8JN