**The Peaceful Pony CIC**

**Safeguarding Child Policy and Procedures**

Approved By: Holly Lockwood-Waduge

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Last Review: 20/05/2024

Next Review: 19/05/2025

# SAFEGUARDING POLICY

The Peaceful Pony CIC has the following trained **Designated Safeguarding Leads:**

1. Founding Director and Senior Therapist: Safeguarding (overall responsibility for safeguarding, Child Protection, recording and monitoring concerns, making referrals and ensuring actions resulting from referrals are carried out, including ensuring all Child Protection Conferences, Core meetings, and Child in Need meetings are attended by appropriately trained school personnel.) – .Holly Lockwood- Waduge
2. Lead for Specialist Alternative Education: Jolyne Ellis

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| Name of DSL | Office area | Telephone | Email |
| Holly Lockwood-Waduge | Staff Office | 07773 687 547 | Thepeacefulpony@gmail.com |
| Jolyne Ellis | Staff Office | 07951 406 773 | j.ellis.tpp@gmail.com |

The nominated Governor for Child Protection is **Holly Lockwood-Waduge**

**Key Contacts within the local authority**: Children and Families Services via Children and Families Hub for referral or for consultation, Monday – Thursday 08.45 – 17.30, and Friday 08.45 – 16.30 03456037627 or out of hours 03456061212 or referral by the online portal [www.essexeffectivesupport.org.uk ;](http://www.essexeffectivesupport.org.uk/) Local Authority Designated Officer (LADO) – Children’s Workforce Allegations Team 03330 139 797 (for referral or consultation where an allegation has been made against a member of the workforce) ; Prevent (for allegations relating to extremism, radicalism or terrorism) email referrals to PREVENT@essex.pnn.police.uk or call 101 for consultation or reporting of a crime related to PREVENT, further contact details for Prevent Champions in Essex are found on ESCB website [here; V](https://www.escb.co.uk/working-with-children/radicalisation/)irgin Care for issues relating to health – 01268 240 300; Essex Safeguarding Children’s Board Safeguarding Officer – 01245 435167 The Police – direct to Essex (for allegations where a crime has been or we suspect may have been committed) 101 or 999 in emergency situations; Emotional Wellbeing and Mental Health Services (EWMHs) 03003001600 or referral by form available from the website or direct from DSL.

# Purpose

At The Peaceful Pony, we are committed to safeguarding children and young people, and we expect everyone who works in our setting to share this commitment. Adults in our setting take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always work in the best interests of the child, taking account of their voice and views. Good safeguarding requires a continuing commitment from governing bodies, proprietors, and all staff to ensure the safety and welfare of children is embedded in all an organisation’s processes, procedures and as such enshrined in its ethos.

The Peaceful Pony Alternative Education setting is not registered with Ofstad, however, is quality assured by local authorities and schools/services which commission us to work with children. Many of our practitioners are registered health professionals and have their own codes of conduct with their own professional bodies. All staff will undergo training in peer support from NHS England and will work in line with all safeguarding national and local policies.

Safeguarding at The Peaceful Pony encompasses all the policies and procedures that we must support this aim including our Child Protection procedures, Health and Safety, child on child abuse procedures and our ethos, which encapsulates the values that every child at The Peaceful Pony is known and known well. Child welfare, support and wellbeing is a central factor to our ethos as an Alternative Education and Therapy setting and this policy lays out the many ways that we use to ensure that this remains at the heart of everything that we do.

Our approach to safeguarding and wellbeing, is influenced by the values of Trauma Perceptive Practice. These are: Trust, Openness, Support, Relatedness and Respect.

Our Child Protection procedures are governed by the law and guidelines for ensuring that children and young people at The Peaceful Pony remain safe. We follow the Southend, Essex and Thurrock guidelines (SET Procedures, ESCB 2022), Working Together to Safeguard Children (DfE, 2024) and the guidelines laid out in the document, Keeping Children Safe in Education (DfE 2023) these are also laid out in this document.

We agree with the following statements:

*“Safeguarding and promoting the welfare of children is* ***everyone’s*** *responsibility.* ***Everyone*** *who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centered. This means that they should consider, at all times, what is in the* ***best interest*** *of the child.*

*No single practitioner can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time,* ***everyone*** *who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.”*

*(Keeping Children Safe in Education – DFE 2023)*

In addition, we seek at all times to fulfil our responsibility in making sure that our entire approach is child centered. This means that we ask staff to consider what is in the best interest of the child when making decisions about child protection and safeguarding issues. At all times, the DSLs in the setting will consider the wider environmental factors in a child or young persons’ life that may be a threat to their security or their welfare and recognise this as a commitment to **Contextual Safeguarding** as referred to in Working Together (2024).

The document, Keeping Children Safe in Education Part 1 (DFE, 2023) must be read in conjunction with this policy. Staff have been issued with this document and the Staff Code of Conduct September and The Behavior for Learning Policy as hard copies (kept in the staff office). In addition, all staff receive induction and annual training on our safeguarding and child protection procedures. Staff also receive quarterly Safeguarding supervision and Clinical supervision where safeguarding topics and what to do if an individual might be concerned about a child or young person at our provision. Further information and training will be delivered to staff on the safeguarding response to Children Missing from Education and the role of the DSLs, which are explicitly explained within this policy.

We recognise safeguarding and promoting the welfare of the child as:

* protecting children from maltreatment
* preventing the 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.

# Introduction

The Peaceful Pony takes seriously its responsibility to protect and safeguard the welfare of children and young people in its care.

“The welfare of the child is paramount” – this statement is key to all training delivered to staff at the setting and is the central tenet of this policy.

*(The Children Act 1989)*

The Governing Body is committed to have policies and procedures in place that safeguard and promote the welfare of children and young people who are present at the setting.

*(Section 175 of the Education Act 2002)*

Our setting will provide clear direction to staff and volunteers, and those employed externally to the setting, but who work within the setting via in-house training. Every member of staff in the employment of The Peaceful Pony will attend annual update training, read and sign for related documents, take part in at least termly training, and where relevant, take part in online CPD opportunities in key issues. A log of training delivered to staff including annual Level 2 and online PREVENT training is kept by the HR manager. Staff also keep personal logs of their CPD, which includes any additional Safeguarding training that they undertake during the year.

In this training and in this policy, we will make explicit our commitment to the development of good practice and sound procedures. We will ensure that safeguarding concerns, referrals and monitoring will be handled sensitively, professionally and in ways that support the needs of the child.

Additional training and specialised support shall be provided via the weekly meeting with key safeguarding leads and additional specialist staff. The aim of this group is to disseminate training from specialist CPD opportunities; and to discuss and provide support around specific case studies.

The overall aim of this package of on-going CPD is that the welfare of the child is always maintained and is paramount.

In this way this provision recognises the following elements to our policy:

* **Prevention** through the creation of a positive atmosphere and the teaching, pastoral and wellbeing support offered to children and young people who are present at our setting, with particular focus on preventing impairment of children’s’ mental and physical health and development.
* **Protection** by following agreed procedures, taking action to enable all children and young people to have the best outcomes, and ensuring all staff are trained and supported to respond appropriately and sensitively to any concerns that they might have in relation to children and young people at our setting, so that children and young people are protected from maltreatment.
* **Support** to children and young people who are present at our settings who may have been abused, or who have been abused, or may be suffering from an additional vulnerability factor such as mental health issues.
* **Taking Action** to enable all children and young people to have the best outcomes.
* **Ensuring** that children and young people grow up in circumstances consistent with the provision of safe and effective care.

This policy applies to all children and young people, parents and carers, staff, governors, volunteers and visitors to our setting.

Our setting recognises that it is an agent of referral, not of investigation. The referral pathway is shown in Appendix 2 and is also distributed for reference to all members of staff via this policy.

# Aims

* Establish and maintain an environment where children and young people in our setting feel safe and secure, are encouraged to talk and are listened to.
* Ensure that all children and young people know whom they can approach if they are worried or in difficulty.
* Include in curriculum activities, social sciences, reflection time, 1:1 therapeutic space, group therapeutic space, specific activities, opportunities for children and young people at our setting to develop the skills they need to stay safe from abuse and to develop safe and healthy relationships. In particular, to foster education about safeguarding issues so that young people recognise when they are at risk and how to get help when they need it.
* Review the impact of these opportunities for helping children and young people at our setting develop their knowledge and skills in relation to safeguarding, so that we are certain that we are using the most effective interventions to provide the best outcomes for children and young people at all times.
* Make parents/carers of children and young people at the setting aware of the policies and practices for safeguarding and ensure that, wherever possible, every effort is made to maintain open and honest and effective relationships with parents and carers.
* Overall, our key aim is to protect children and young people from harm, and to ensure that they are taught in a way that is consistent with the law, our values, and to promote respect for all others within our institution and wider community. To this end, we will facilitate understanding of wider issues within the context of learning about the values upon which our society is founded and the principles which govern our system of democratic government. Therefore, we will actively promote British values such as democracy, individual liberty, mutual respect and tolerance of those with different faith and beliefs. Preventative education is the most effective way to prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, racism, biphobic and sexual violence/harassment.

# The Statutory Framework

Section 175 of The Education Act 2002 places a statutory responsibility on the governing body to have policies and procedures in place that safeguard and promote the welfare of children and young people at our setting.

Child Protection is the responsibility of all adults, and especially those working with children. The development of appropriate procedures and the monitoring of good practice are the responsibilities of the setting’s leaders and the governors, and wider support in this process is the responsibility of the Essex Safeguarding Children’s Board. (ESCB)

In Essex, all professionals must work in accordance with the SET procedures (ESCB 2022). These procedures can be referenced online via the ESCB, via the setting’s safeguarding recording system or physically via the DSL.

Our setting also works in accordance with Section 175 of The Education Act [2002,](https://www.legislation.gov.uk/ukpga/2002/32/section/175)

Children’s Act [1989,](https://www.legislation.gov.uk/ukpga/1989/41/contents) Children’s Act [2004,](https://www.legislation.gov.uk/ukpga/2004/31/contents) ’Keeping Children Safe in Education’ (DFE [2023),](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161275/Keeping_children_safe_in_education_2023_part_one.pdf) ‘Working Together’ (DfE 2024), What To Do If You Think a Child is Being

Abused (HMG [2015),](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf) Information Sharing and Advice for Safeguarding Practitioners

(HMG [2018)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf) and ‘Effective Support for Children and Families in Essex’ (ECSB2024)

Promoting Positive Emotional Wellbeing and Reducing the Risk of Suicide (ECSB

2018), Preventing and Tackling Bullying (DfE [2017),](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069688/Preventing_and_tackling_bullying_advice.pdf) Use of Reasonable Force (DfE [2013),](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf) Reducing need for restraint and restrictive intervention (HMG [2019),](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812435/reducing-the-need-for-restraint-and-restrictive-intervention.pdf) Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCCIS, [2020),](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008443/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings__Web_accessible_.pdf) Searching , Screening and Confiscation (DFE [2022),](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091132/Searching__Screening_and_Confiscation_guidance_July_2022.pdf) Preventing Youth Violence and Gang Involvement (home Office [2015);](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf) Criminal Exploitation of Children and Vulnerable Adults- County Lines Guidance (Home Office [2018);](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf) Teaching Online Safety in Schools (DFE [2023).](https://www.gov.uk/government/publications/teaching-online-safety-in-schools/teaching-online-safety-in-schools)

Additional regulations that guide our procedures are: Serious Crime Act [2015,](https://www.legislation.gov.uk/ukpga/2015/9/contents/enacted) including Female Genital Mutilation Act [(2003);](https://www.legislation.gov.uk/ukpga/2003/31/contents) Children and Social care Act [2017,](https://www.legislation.gov.uk/ukpga/2017/16/contents/enacted) Sexual Offences Act ([2003);](https://www.legislation.gov.uk/ukpga/2003/42/contents) Education (Pupil Registration) Regulations ([2006);](https://www.legislation.gov.uk/uksi/2006/1751/contents/made)

Children Missing Education – statutory guidance for Local Authorities (DfE [2016);](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

General Data Protection Regulations and Data Protection Act [(2018).](https://www.gov.uk/data-protection)

We also work in accordance with the Counter Terrorism and Security Act ([2015).](https://www.gov.uk/government/collections/counter-terrorism-and-security-bill) Under Section 26 of this Act, this setting has due regard in our policies and procedures to the need to prevent young people from being drawn into terrorism or radicalisation. This duty is known as the **PREVENT** duty. This duty is also reflected in our training schedule for all staff, monitored via our CPD systems.

This training requires staff who are concerned that children or young people may be developing extremist views or show signs of becoming radicalised to refer to a designated safeguarding lead in the setting immediately.

Additionally, in this respect, our setting undertakes to support a broad and balanced learning curriculum, which promotes spiritual, moral, cultural, mental and physical development of young people. We want to prepare young people for the opportunities, responsibilities and experiences of life by promoting community cohesion and giving children and young people the time and space to talk about sensitive issues when required. To this end we have created safe spaces for young people to talk about all manner of issues, including if needed, ideas that could be part of terrorist ideology, providing alternatives and the capacity to challenge misconceptions and threats to our published values. Staff are reminded to be mindful about the potential for political viewpoints to be perceived as the ‘right way of thinking’ by young people. Any child/young person perceived to be at risk in this respect will be referred to **CHANNEL Panel,** which is the part of the PREVENT programme to which children and young people are directly referred if they are at risk at being radicalised or groomed into extremist views. In addition, if a child or young person is referred to PREVENT, they will also be referred to Social Care in line with SET procedures. In such cases, the school will follow The Essex Prevent Referral Flowchart, available on the ESCB website and reprinted in this policy document in Appendix 5.

The school also works in accordance with the Serious Crime Act [(2015) b](https://www.legislation.gov.uk/ukpga/2015/9/contents/enacted)y recognising and upholding the duty of all adults who work with children/young people to directly notify the police of known cases of Female Genital Mutilation, where it appears to have been carried out on a girl aged under 18. Our setting will operate in accordance with statutory requirements relating to this issue, and in line with SET procedures.

Our setting also works in accordance with statutory guidance and SET procedures in respect of allegations made against an adult who works with children in either a paid or in a voluntary capacity. Section 7 of the current SET procedures provides detailed information on this possibility, and the setting has processes in place for reporting any concerns about a member of staff (or any adult working with children). In the event that any allegation is received about a member of staff, which points to the individual being a risk or causing actual significant harm to a child or young person, the Local Authority Designated Officer (LADO) will be informed within one working day, and no investigation will be carried out prior to communicating the issue to the LADO.

# The Peaceful Pony Policy

We recognise that for our children and young people, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps prevent abuse. Our setting will therefore:

1. Establish an environment in which children and young people feel safe and secure and are encouraged to talk and are listened to, as evidenced by our trained support worker staff, therapists, counsellors. This policy will therefore work closely with our Staff Code of Conduct, our Freedom to Speak (Whistleblowing) Policy, Confidentiality Policy, Online safety Policy, Child on Child Abuse Policy, Equality and Diversity Policy, Anti Extremism and Radicalisation Statement and our Behaviour and Learning Policy.
2. Ensure that children and young people know that there are adults within the setting who they can approach if they are worried or in difficulty.
3. Include across the learning experiences, work schemes that will help learners develop realistic attitudes towards the responsibilities of adult life.
4. Ensure that wherever possible every effort will be made to establish effective working partnerships with parents and with colleagues from outside agencies and external safeguarding partners.
5. Ensure that opportunities for learners to learn about safeguarding issues. In addition, to ensure that there is flexibility in the programme to respond to monitored patterns or single issues that might arise in year.

# Roles and Responsibilities

Child safeguarding is the responsibility of **all adults.** Staff should not assume a colleague, or another professional will act and share information that might be critical in keeping children safe. The setting recognises that for services to be effective, each professional and organisation must play their full part.

All staff should be aware of the signs of abuse so that they can identify children and young people who may need help or protection. All staff are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about the welfare of a child or young person, all staff should always act in the interests of the child or young person.

The development of appropriate procedures is the responsibility of the DSL who has been appropriately trained by the Essex Safeguarding Children Board. Additionally, it is the role of the DSL to ensure all staff employed, including temporary staff and volunteers within the setting are aware of the setting’s internal procedures and to advise and offer support to those requiring this. In addition, The DSLs will manage concerns from the setting or any concerns on matters of safety from outside the setting; liaise with other professionals and agencies; and ensure attendance at any meeting that requires the setting’s professional input regards the safety of a child or young person. In addition, the DSLs will manage any attendant or ensuing paperwork, and also ensure that any Child Protection information is transferred to a new school or college where necessary.

It is also the role of the Designated Safeguarding Leads to ensure that all child protection procedures are followed within our setting, and to make timely and appropriate referrals to Children’s Social Care and/or The Police in accordance with SET procedures (ESCB 2022).

The Designated Safeguarding Leads will ensure that all concerns are reviewed at least three times a year and will undertake an annual Safeguarding Audit in line with their responsibilities under Section 157 and 175 of the Education Act 2002.

**Key DSL responsibility: What to do if any member of staff has a concern about a child or young person?**

At The Peaceful Pony we train staff and volunteers to do the following if they have concerns about a child or young person. We also give information to visitors about what to do if they have any concerns about children or adults attending our setting. This advice to staff, volunteers and visitors is summarised on our signs in our office.

* Tell one of the Designated Safeguarding Leads immediately verbally, by telephone or by email. For any risk of imminent harm the report should be made in person to a DSL to ensure safety measures can be put in place in a timely fashion.
* The DSL will have a short conversation with you to find out the facts.
* You will then be asked to record your account within 24 hours of the initial conversation (Child’s notes).
* State clearly in the record:

|  |
| --- |
| The name, year group and school the child attends you are referring to. |
| The detail of your concern – try to write exactly what a child has said to you, using their words, if they made a disclosure, or what you may have overheard or what you have been told, or a change in behaviors, attitude, or demeanor of a child or young person that has made you curious about their wellbeing. It should be a written record of facts as observed, not personal or professional opinion. |
| Always make it clear where the information came from and by which pathway – **YOU CANNOT MAINTAIN CONFIDENTIALITY.** |
| Please be as accurate as possible – in the long run your record could be used in court as a primary document. |

* If a DSL is not immediately available, seek guidance from Senior Leads and Senior in Charge Remember you can also relay your concerns direct to the Children and Families Hub (concerns about a child) or the Local Authority Designated Officer (concerns about a member of the workforce working with children), and both numbers are printed on your yellow card.

The Peaceful Pony ensures that the policies, procedures and training in our setting

are effective and comply with the law at all times. It ensures that all required policies relating to safeguarding are in place and that the Safeguarding and Child Protection Policy reflects statutory and local guidance and is reviewed at least annually.

The Peaceful Pony ensures the setting contributes to inter-agency working, in line with statutory and local guidance. It ensures that information is shared and stored appropriately and in accordance with statutory requirements.

The Peaceful Pony ensures that all staff members undergo safeguarding and child protection training at induction and that it is then regularly updated. All staff members receive regular safeguarding and child protection updates, at least annually, to provide them with the relevant skills and knowledge to keep our children safe.

The Peaceful Pony ensures that children are taught about safeguarding, including online, through teaching and learning opportunities as part of a broad and balanced curriculum. Also, by ensuring that appropriate filters and monitoring systems for online usage are in place.

The Peaceful Pony are also responsible for ensuring that we follow safe recruitment procedures and that all appropriate checks and pre appointment checks are carried out on staff and regular volunteers who work with children; and that the setting has procedures for dealing with allegations of abuse against members of staff and volunteers that comply with statutory guidance. As part of the setting’s recruitment and vetting process, attention will be drawn to the DBS check and any other local intelligence required. Recruiters and those responsible for staff understand the concept of ‘transferable risk’ which means that if DBS shows an incident involving adults, the setting must consider whether the risk could be applied to their work with children. There will always be a senior member of staff who is trained on ‘Safer Recruitment’ procedures on every interview panel. In this way, the setting undertakes to follow recruitment guidance and procedures that help maintain a culture of vigilance and deter, reject and identify people who might abuse children. Training certificates for staff trained in Safer Recruitment are held by our Director of Operations, as are the training certificates of the Designated Safeguarding Leads.

Our setting will not allow any individual whomwe have reason to believe is barred from regulated activity to work at the setting in any capacity.

The role of our Named Safeguarding Lead/DSL is to ensure that the setting has an effective policy and effective procedures, and that this is updated at least annually; to ensure that ESCB guidelines and SET procedures are complied with, and to support the setting in this aspect.

Director of Operations and Named Safeguarding Lead/DSL will also ensure that there is a maintained **Single Central Record** of staff and regular volunteers. Also, that the setting has an up-to-date Code of Conduct for staff, which includes our   
Freedom to Speak Policy.

Director of Operations and Named Safeguarding Lead/DSL must ensure that procedures are carried out in relation to allegations against members of staff, visitors, volunteers and children and young people. Where an allegation is made against the DSL’s, Director of Operations or other Senior Leader will take responsibility for ensuring that any referral, investigation or subsequent action is properly conducted and in accordance with SET procedures (ESCB 2022).

In the event of a member of staff being dismissed because of an allegation of abuse, The Peaceful Pony will inform the DBS. This is a legal duty where an individual engaged in a regulated activity is dismissed from the setting due to safeguarding concerns.

Director of Operations and Named Safeguarding Lead/DSL will recognise that there is always an emotional impact on staff dealing with safeguarding issues and will provide support when staff request it and signpost support as an on-going protocol designed to help staff who are feeling stressed.

The Designated Safeguarding Leads (DSLs) take lead responsibility for managing child protection referrals, safeguarding training and raising awareness of all child protection policies and procedures. They ensure that everyone within our provision (including temporary staff, volunteers and contractors) are aware of these procedures and that they are followed at all times. They act as a source of advice and support for other staff (on child protection matters) and ensure that timely referrals to Essex Children’s Social Care (Children and Families Hub) are made in accordance with current SET procedures. They work with the local authority and other agencies as required.

If for any reason the DSL is unavailable, the Deputy DSLs take relevant action.

The DSL will be responsible for ensuring that the setting will publish its Safeguarding Policy on our website, also in our office. The DSL will provide an annual report for Governors detailing the training of staff and any changes to the policies and procedures that may be required in the light of updates to the legislative framework.

Ultimately, the DSL will take overall responsibility for ensuring the safeguarding of children and young people at The Peaceful Pony.

In addition, all staff will recognise their responsibility to refer all concerns, not to promise confidentiality, and also to take every opportunity to teach children and young people how to be safe. Staff will participate in all interactions/ activities through the day, deliver important Safeguarding messages, facilitate discussions and participate in and be present at specially arranged safeguarding related workshops for children and young people, emphasise safeguarding opportunities in the curriculum and ensure our ethos and values are upheld.

# The Peaceful Pony’s Procedures

All staff will receive Level 2 safeguarding training on induction and annually thereafter, and this training will be logged and held centrally for each individual. All staff will be informed who the Designated Safeguarding Leads (displayed in each learning zone) Children and Families Hub number is also displayed, which can be called by any adult working with children should they feel that their concerns about an individual or an issue have not been adequately met. Additionally, the number for The Local Authority Designated lead (LADO) is displayed, so that any professional who has concerns about any adult working with children or young people can call direct should they feel unable to talk to an appropriate person in our setting.

Visitors will be given a visitor’s badge and will be asked to prove whether or not they have a current DBS check. They will be given a leaflet that summarises this policy and our wider safeguarding expectations on them as visitors to the setting. If they do not have a current DBS check as proven either by certificate or by a current working with children identification badge, they will be always supervised whilst on site. Visitors with proven identity and safeguarding checks will wear COLOURED (but not red) lanyards and will be able to access the setting and children and young people in the course of their duties e.g. as social workers visiting named children or as known facilitators running courses. All visitors with red lanyards, however, will be accompanied at all times and will be escorted back to reception should they become unsupervised. This is the responsibility of all staff in our setting.

Posters in reception also emphasise our policy and identify the DSLs in our setting. In addition, there are many safeguarding related posters all around the setting, so that the issue of safeguarding is advertised everywhere and serves as a constant reminder to all who enter the setting for any reason.

Any member of staff, volunteer or visitor to the setting who receives a disclosure of abuse, an allegation or a suspicion of abuse **must** inform one of the DSLs immediately, who will then take responsibility for any required action.

The matter will be handled in accordance with the Interdisciplinary Guidelines laid down by SET and ESCB. Where a referral to Social Services is deemed necessary, The Children and Families Hub will be informed by telephone and the referral confirmed via the Essex Effective Support online portal where necessary. This can be found via the ESCB website. Referral procedures for any child or young person who attends our setting, but lives outside the area covered by the SET procedures will be followed according to their localised procedures, which will be checked prior to referral. The setting may also take advice from an appropriate agency like The Children and Families Hub when the concern raised may not constitute a concern about a child being at risk of harm but could be an indicator and early help/support may be appropriate.

Essential information will include the learner’s name, address, date of birth, family composition, the reason for the referral, whether the child’s parents are aware of the referral, the name of the person who initially received the disclosure, plus any advice given from Children and Families or the Police.

The setting will always share our intention to refer a child to Social Care Service with the parents or carers unless to do so could place the child at greater risk of harm or impede a criminal investigation. On these occasions advice will be taken from Essex Children’s Social Care Services or Essex Police. In addition, there will be some occasions where the disclosure is complex, and in these cases the DSLs will take advice from Children and Families Hub or Police and will follow that advice, even if this means that on rare occasions that parents are not told about the referral.

**If a member of staff continues to have concerns about a child or young person who attends our setting and feels that the situation is not being addressed or does not appear to be improving, the staff member should press for reconsideration, follow the setting’s complaints procedure and make a referral direct to Social Care themselves, using the number of The Children and Families Hub,: 0345 603 7276**

# Training and support

The DSLs will undergo updated child protection training every two years. All staff will receive annual Level 2 training, and also training on specific issues like PREVENT. Governors also receive annual training to ensure that their knowledge of safeguarding issues are updated. A record of all child protection training is kept by the HR manager and is available for perusal at any time. The setting also ensures that the DSLs and other relevant staff undertake training with regards inter agency working and other such matters as appropriate to their roles.

In addition, the DSLs will ensure that they understand the assessment process for providing early help and intervention and have working knowledge of how the different local authorities that our children and young people live in conduct child protection matters, including Child Protection Case Conferences, reviews and action planning. In addition, the DSLs must ensure that relevant staff are able to attend such meetings and contribute to them effectively.

The DSLs will also undertake training in inter-agencyworking and training in specific issues such as Child Exploitation and Honour Based Abuse. This training will be disseminated to other staff as and when it is completed. All interagency training will be shared with, and discussed with the Safeguarding Board.

The Designated Safeguarding Leads will provide support and supervision to staff involved in child protection issues. The DSL will receive safeguarding supervision from NSPCC Safeguarding Supervisor. The DSLs will update the policy as necessary during the year.

All staff sign for and undertake to be bound by the boundaries of appropriate professional behaviour and conduct. These matters form part of staff induction and are referred to in the Staff Code of Conduct and Staff Guide.

Staff should also be alert to specific needs of children, especially those with SEND, mental health issues and those with extreme vulnerabilities at home. **Overall, and most importantly, staff must adhere to a culture of listening to children and ensuring their viewpoints are reflected in decision making.**

# Professional Confidentiality

Confidentiality is an issue that is at the heart of the setting’s training, given that this is likely to be a difficult aspect of responding to a child’s disclosure. A member of staff must never promise confidentiality to a child or young person nor should they agree with them to keep a secret, as where there is a safeguarding concern this must be reported to the DSLs and may require further investigation by the appropriate authorities. Further details on confidentiality can be found in the setting’s Code of Conduct Policy, which runs alongside the Safeguarding Policy.

Staff will be informed of relevant information in respect of individual cases regarding child protection on a “need to know basis” only. Any information shared with a member of staff in this way must be held confidentially to themselves.

Staff are trained to understand that the only purpose of confidentiality in this respect is to benefit the child.

Staff who refer a concern should follow up with the relevant DSL if they do not know what action has occurred in respect of their referral. Staff must also understand that the processes of safeguarding and child protection are sometimes complex and ongoing, and in addition, that in most cases, parents need to give permission for confidential information to be shared with staff.

# Records and Information Sharing

Well-kept records are essential to a good safeguarding and child protection practice. Our setting is clear about the need to record any concerns held about a child or young person at our setting, the status of these records and when such records should be passed over to other agencies.

Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child or a vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are safeguarding concerns. Fears about sharing information cannot stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. Generic data flows related to child protection are recorded and regularly reviewed and will be shared, where necessary with the relevant agencies. All concerns, discussions and decisions made and the reasons for those decisions will be recorded in writing. If staff are in any doubt about recording arrangements, they must check directly with the DSLs.

Any member of staff receiving a disclosure or noticing any signs/symptoms of possible abuse must make an accurate written record as soon as possible. This is facilitated through My Concern which automatically dates and times the report. Records of incidents, accompanying actions and safeguarding related notes are automatically stored chronologically and can only be edited by DSLs. Categorisation of an incident is decided by a DSL, the headline categories match the windscreen of support to make liaison with other agencies easier and ensure the needs of the child are paramount. All cases are reviewed at least three times a year and more regularly as required if the case is currently of high concern.

In line with statutory guidance, if a learner moves to a new school or provision this information will be shared with the Designated Child Protection Officer via secure email. Where an institution also uses My Concern, this process will be entirely online linked securely.

**Attendance at Child Protection Conferences and Partnership Meetings/Interagency**

**working**

It is the responsibility of the DSL to ensure that the provision is represented and a report submitted to any child protection conference called Whoever attends will be fully briefed on any issues or concerns the school has and be prepared to contribute to the discussions at the conference.

If a child is made subject to a Child Protection Plan, it is the DSL’s responsibility to ensure that the child is monitored regarding attendance, welfare and presentation. (Refer to the SET procedures Chapter 8 for conferences and 9.4 for Child Protection Plans). If the school is part of a core group, then the DSL must ensure that the provision is represented and contributes to the plan made at these meetings. They must also ensure that attendance at these meetings is recorded along with minutes of any issues discussed. All issues will be discussed at these meetings, but if in the interim, the DSLs believe that the child is further at risk of significant harm, they must inform the child’s key worker immediately, and record that they have done so and the key actions agreed. Any aspects of the plan that need sharing, will be shared and acted upon appropriately. This also refers to Child in Need meetings, where a child or young person is designated ‘Child in Need’.

Furthermore, The DSL will also ensure that staff attending Child Protection Conferences are appropriately trained so that full contribution to the child centered methodology of these conferences can be made.

**Looked After Children (LAC):** LAC are the responsibility of the Designated Lead who is a member of the core safeguarding team. File notes pertaining to LAC are kept in the child’s drive, but also My Concern. The Senior in Charge each day will be assigned to each child who is LAC will be responsible for the day to day contact and support of LAC. They will attend any review meetings and ensure that strategies discussed and agreed at review meetings are implemented.

**Children who are Care leavers or Adopted from Care:** the setting recognises that children who are care leavers or are adopted need ongoing support even if the authorities are no longer involved in their lives. The provision of this support will between the safeguarding and pastoral teams, who will liaise with the child and their families in order to provide the best support possible within our systems in consultation with relevant post adoptive services. There will be an ongoing review system to ensure this support remains effective, and staff will be made aware who children from such backgrounds are, with an expectation of being aware of the long term effects of trauma and attachment issues on learning, and to ensure that these effects are mitigated as much as possible in the course of their work.

**Social Care involvement:** The setting recognises that social care workers may work with a family and individual young people for a variety of reasons. Where this involvement is known the setting is committed to further academic and social support for the young person to help promote education outcomes and will act in accordance with the Working Together philosophy.

**Young Carer:** the setting recognises that being a young carer places a child or young person in a particular position of vulnerability; and we seek to identify, offer and put in place additional support where this might be the case.

**Children Absent from Education**: a child going missing from education is a potential indicator of abuse and neglect, it also increases the risk of child exploitation. All children regardless of their age, ability, aptitude and special educational needs are entitled to a full time education. It is also recognised that, when not in school, children may be vulnerable to or exposed to other risks. **The Peaceful Pony Procedures for dealing with CAE:** Parents must always advise us of any absence as and when it occurs or in advance if possible. Every effort will be made to contact a key adult with parental responsibility or named as an emergency contact if this has not occurred. It is for this reason that at least two emergency contacts are required for each learner. Parent/carers must update the setting as soon as possible should numbers change. Where contact has not been possible, appropriate referral routes to outside agencies responsible for checking on a child’s welfare will be made. (Essex Education Access Team, Social Care, Police). The setting will follow our **Attendance Policy** for all procedures regarding children missing school, for example, unauthorised absences and for children who are regularly missing education. We monitor attendance carefully and we address irregular or poor attendance without delay. We will always follow up children and young people who have not attended their session. Staff are asked to keep in mind that absences may be an indicator of serious abuse of a child or young person such as FGM, CSE or trafficking and slavery for example. It is essential that staff know what to do if a child or young person has not turned up or does not attend regularly.

**Children with special educational needs and disabilities:**

Our setting understands that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. To support in this specialised area our Senco will work directly with DSL.

Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

Assumptions that indicators of possible abuse such as behaviors, mood and injury relate to the child’s disability without further exploration.

* Children with SEN and disabilities can be disproportionally impacted by things like bullying- without outwardly showing any signs.
* Communication barriers and difficulties in overcoming these barriers can make understanding of safeguarding matters more challenging for children and young people and sometimes their parents/carers.

In these circumstances, staff will use our SEND review and Provision Planning processes to ensure that the issues are explained carefully and that our children and young people and parents/carers know exactly who to contact in the setting should they have any concerns about the processes of Safeguarding. This process is detailed in our SEND policy.

**Supporting Children and young people who are at risk of harm and or significant harm:**

Our setting recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth or to view the world as a positive place. We also recognise that our setting may be the only stable, safe and secure environment in the lives of children and young people at risk.

Children and young people who at risk of harm and/or significant harm are supported under the umbrella of the Essex Effective Support Windscreen, from which a model to support children and young people at The Peaceful Pony has been devised (Appendix 1). This model is reviewed annually and consists of universal, additional, intensive and speciality referral to interventions both within the setting and to outside agencies.

Therapists and Senior Leaders will inform staff via morning handover meetings if interventions are in place in relation to individual children and young people. Interventions will be recorded via the setting safeguarding systems and judgements about impact will be made with reference to achievement and progress data, behaviors points, achievement points, and attendance and wellbeing measurements. Staff are reminded that such communications are strictly confidential and must never be open to individual scrutiny.

Our setting will also endeavor to support such children and young people through their Therapists, Keyworkers and Peer support workers. There will be regular liaison with outside agencies, families of vulnerable children and young people, and a commitment to develop open and honest and supportive relationships with all who are working with such children and young people.

# Contextual Safeguarding

Safeguarding incidents and behaviors can be associated with factors outside of our setting. All staff are made aware of contextual safeguarding and are asked to consider whether wider environmental factors in a child’s life are a threat to their welfare and/or their safety. To this end we will consider relevant outside factors and include it in any information sharing necessary with outside agencies to support better understanding of a child’s/family’s welfare

Staff training reinforces what the signs and symptoms of abuse are, with specific reference to physical, sexual, neglect and emotional abuse. Staff are also asked to be aware of current ‘hot issues’ in safeguarding and be particularly vigilant in the following areas:

# Types of Abuse, Neglect and Specific Safeguarding issues

**Signs and Symptoms of abuse – I**t is possible that children and young people can disguise the signs and symptoms of abuse if they wish to. Therefore, the most effective indicator of possible abuse is a child’s or young person’s change in behaviors.

Behavioural indicators of abuse as signposted by the National Institute for Care Excellence (NICE February 2017) require staff to be aware of ‘soft signs’ such as excessive clinginess, low self-esteem, reporting disturbed sleep patterns or recurrent nightmares, aggressive displays, marked changes in behaviors or repeated usual (for the child or young person) behaviors or sustained emotional responses. Staff must also report if a child or young person deliberately avoids interaction with peers or adults, displays self-harming behaviors, eating disorders, suicidal ideation, bullying or being bullied, has run away from home or care, indicates that they do not want to go home or indicates that they are living away from their usual accommodation. In addition, staff must also report if a child steals food, discloses a poor standard of hygiene or an unsafe environment at home.

KCSIE (2023) defines abuse as *“*a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children*.”*

KCSIE (2023) defines the categories as:

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

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

**Sexual abuse -** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college’s policy and procedures for dealing with it.

**Neglect -** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

**Specific issues:**

**Radicalisation/Extremism** – early indicators of radicalisation or extremism may include: showing sympathy for extremist causes; glorifying violence; making comments about attending extremist events or rallies outside of school; referring to/possessing extremist literature; advocating messages similar to extremist organisations; and out of character changes in behaviour, dress, peer relationships including secretive behaviour; online searches or sharing of extremist messages or profiles; intolerance of difference, graffiti or artwork exposing extremist views; and/or attempts to impose extremist views or practices on others. Vulnerability factors include the child or young person is confused about or seeking out identity indicators, including becoming distanced from personal heritage, discomfort about their place in society, personal crisis/tension in the family, loss of self-esteem, disassociated from previous friendship group, searching for answers about identity, faith and belonging, unmet aspirations, perceptions of injustice, and experience of criminality. In the event that radicalisation or extremism is suspected or disclosed our setting will make a referral to the police (PREVENT) and also to Social Care, (see p8 – 9 of this policy, and Appendix 5).

**Self-Harm** – in the case that self-harm is disclosed, discovered or suspected, this should be referred to a DSL as a concern. If the child is injured, then they should be taken to first aid immediately. A DSL will assess the situation and make recommendations to the Interventions Team for follow up care. Referral will be made to either our in house counselling services. In severe cases, tier two, three or even four services will be referred to, including taking a child or young person to Accident and Emergency for immediate psychiatric assessment for students for whom an immediate suicide risk is judged to be present. In the event that self-harm is suspected or discovered, the parent/carer will be informed and consent will be sought for the child to undergo an assessment by an appropriate staff member, who is trained to assess and make recommendations for interventions to support a child or young person who does this. Our setting also uses ESCB’s ‘Suicide Prevention’ toolkit to further support in this area. This is supported by ‘How to promote positive emotional wellbeing and reduce the risk of suicide in children and young people – guidance for school’ (ESCB 2018) and can be found on the ESCB website, and in the safeguarding file on the setting network.

**Promoting Positive Mental Health and Resilience -** positive mental health is the concern of the whole community and we recognise that education play a key part in this. Our provision wants to develop the emotional wellbeing and resilience of all pupils and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors which increase someone’s vulnerability and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual’s life, the more protective factors or supportive interventions are required to counterbalance and promote further growth of resilience.

It is vital that we work in partnership with parents to support the well-being of our children and young people. Parents should share any concerns about the well-being of their child with us, so appropriate support and interventions can be identified and implemented, and in turn we will share verified concerns with parents and support them to support their children in these circumstances. Several of our staff are trained in mental health first aid and we endeavour to use a language and develop active strategies to help children and young people who feel that their mental health is compromised in any way. In line with the guidance from *KCSIE (2023)* we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Additionally, the understanding that mental health conditions can be indicators of underlying safeguarding concerns is made clear to staff via training, with the lasting impact of adversity and trauma on education, behaviour, mental health and wellbeing explored.

**Child on Child Abuse** - Our setting has an extensive Child on Child abuse policy. This policy outlines what constitutes a concern, what harmful sexual behaviour is and our commitment to zero tolerance and supporting those involved. It also outlines potential responses. Please see that policy for further guidance.

Within the policy there is a signpost to the NSPCC who offer a *“Report Abuse in Education”* Helpline via 0800 136 663 or help@nspcc.org.uk

**Online Safety -** The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

* content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, and extremism.
* contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
* conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
* commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, children and young people or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

Our setting is committed to referring to agencies like CEOP and ‘ThinkuKnow’ for further support when required and for materials in support of education and training of young people and parents /carers to support online safety at home. The setting adheres to Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCCIS, [2020),](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008443/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings__Web_accessible_.pdf) and therefore will always refer to Police and Social Care if the incident involves an adult, coercion, blackmail or grooming, concerns about the capacity to consent, the images are atypical of age appropriate development, violent acts are depicted, sexual imagery is depicted and includes a child aged under 14, a young person is or appears to be at risk of significant harm. Our **Online Safety Policy** sets out the procedures for staff dealing with sexting in an appropriate manner that safeguards children and young people concerned. Our **Behaviour Learning Policy** explains how our setting manages children and young people’s use of their own devices and our expectations, training and support pertinent to this area.

**Filtering and monitoring -** We meet the Filtering and Monitoring standards for schools and colleges. Staff are regularly trained and updated including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Further detail is located in our Online Safety Policy.

**Sexual Violence and Sexual Harassment -** We follow the definition of sexual harassment as ‘unwanted conduct of a sexual nature’, and implement the concept that sexual misconduct is not acceptable, not banter and is not an inevitable part of growing up. We recognise that children and young people in the following groups are likely to be most at risk, although any child or young person might be at risk – including girls, persons who identify as LGBT+, or are perceived by peers to be LGBT+, and persons with SEND. In the event of sexual violence or sexual harassment occurring the setting will follow the procedures laid down in our **Behaviour Learning Policy** and apply the appropriate support and consequences. Incidents of sexual violence and harassment will be recorded and reviewed so that as a setting we can understand the scale of the problem in our setting and take the appropriate steps to deal with it where patterns emerge. If a perpetrator is identified, then a risk assessment around that person will be implemented.

**Honour based violence and abuse (HBV) -** HBV encompasses crimes, which have been committed in the name of ‘honour ‘of the family or community. It includes practices such as forced marriage, female genital mutilation, and breast ironing. Staff are trained to understand the ‘one chance rule’, defined as a sign or symptom that is easy to rationalise as being part of someone’s culture. However, the use of violence, threats or any other type of coercion are often a part of this abuse, and it is a crime. Where the setting knows about this kind of abuse, or suspects it is happening, we will report it to the police and to social care. For example, a child telling an adult that they are going on holiday for a ‘special celebration’ that ‘will make me a part of my family/community’. Every care is taken to identify and support students to whom this might pertain. Staff are asked to report any of the following warning signs that often accompany a child at risk of **forced marriage** (this is a marriage entered into without the full consent of one or both parties. Often violence, threats or other coercion will be used to facilitate it, and it is a crime). Signs of a forced marriage might be an extended absence, drop in performance, excessive parental restrictions, and history of older siblings leaving to get married, evidence of self-harm, depression, social isolation, eating disorders, substance misuse, domestic violence, family disputes or running away from home. If the setting suspects or discovers that forced marriage has happened or is about to happen, specialist advise will be taken from the **Forced Marriage Unit 0207 008 0151** and the issue will be reported to the police and Social Care.

**Female Genital Mutilation (FGM) -** FGM refers to the procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. This comprises all procedures involving partial or total removal of external female genitalia or other injury to the female genital organs. The practice is illegal in the UK. FGM typically takes place between birth and 15 years old; however, it is believed that the majority of cases take place between the ages of 5 – 8 and therefore our setting may well deal with cases where it has already occurred or is about to happen to younger member of the family or friend. Staff are asked to look out for and report the following, which may be signs of FGM:

* all children or young people who report a ‘special celebration’ without saying what it is,
* child or young person reporting a long holiday without explaining what it is about,
* children and young people disclosing that a family elder, typically female, is visiting the family home but do not know why.

Other signs and symptoms include an individual female suddenly developing unexplained persistent pain in the genital or stomach area, a different way of moving around, difficulties with toileting, frequent bladder or menstrual difficulties and reluctance to undergo normal medical investigations.

Staff are reminded that there is a **legal mandatory duty on people who work with children to report cases of known FGM directly to the police**, and that our setting will always pass on such disclosures to Social care and the police immediately. In addition our setting will always seek additional support through the NSPCC helpline 0800 028 3550.

**Serious Violence -** All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from their school or our setting, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Our setting seeks to educate children and young people and their parents/carers about the risks of being involved in such crime and will always report any known connections to the police, and where evidence is available, to Social Care.

**Child Sexual Exploitation and Child Criminal exploitation -** Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

**County Lines -** This is the police term for urban gangs supplying drugs to suburban, coastal and rural areas using dedicated mobile phones or ‘deal lines’. Children who are criminally exploited may be used to move the drugs and monies involved in county lines. They may also be at risk of serious violence. Gangs often establish a base in the locality by taking over homes of vulnerable adults by force or coercion in a practice known as **‘cuckooing’**.

# Statutory definition of Child Sexual Exploitation

*“Child sexual exploitation is a form of child sexual abuse, which can happen to boys and girls from any background or community. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.”*

‘Working Together to Safeguard Children’ (DfE 2023)

it is understood that a significant number of children who are victims of CSE go missing from home and/or school at some point.

Our staff are asked to look out for and report the following: evidence that a child regularly goes home very late, comes to our setting with unexplained gifts such as jewellery, mobile phones, money, associates with unknown adults, becomes withdrawn from family and friends, suffers from sexually transmitted diseases, experiments with drugs and alcohol, has a poor self-image, self-harms, has eating disorders, has an older boyfriend/girlfriend outside of normal age group. Our setting recognises that children may be the perpetrators of abuse, and in the event that this is suspected or uncovered will make referrals to both the police and Social Care in respect of both the victim and alleged perpetrator. Our setting agrees to and follows agreed SET risk assessments, framework and referral pathways for CSE available on the ESCB website.

Our setting recognises that certain children and young people may be more vulnerable to Child exploitation, although exploitation does occur without any of the following issues being present in a young person’s life, background or family: having prior experience of abuse, experiencing periods of instability in the family such as witnessing domestic violence or parental substance misuse; having suffered from a recent bereavement or loss; who feels isolated or has social difficulties; whose accommodation is insecure and having connections with family or friends who are themselves being exploited. In particular, our setting recognises the extreme vulnerability of children who have a physical or a learning disability; who are in Care, or who are care leavers. 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

**Unhealthy relationships –** our setting looks out for signs and symptoms that young people are in an age appropriate relationship, which is unhealthy. This includes controlling behaviour from one to another, coercive behaviour including threats, humiliation and intimidation. If children and young people are believed or known to be in such relationships and their parents or carers fail to safeguard them appropriately then referral will be made to social care and where appropriate to the police.

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

**Private Fostering -** This is where an arrangement is made without the involvement of the Local Authority for the care of a child aged 16 and under or 18 and under is disabled, by someone who is not their parent or close relative, in a private home, with the intention that the care should last for 28 days or more. We have a mandatory duty to report private fostering, and we will do so. Therefore, if staff become aware of a private fostering arrangement, they must report it to a DSL immediately. In addition, on admission to the setting, we will take steps to verify the relationship of the adult to the child who is being registered.

## Safe Setting, Safe Staff, Safe Learners

It is essential that the high standards of concern and professional responsibility adopted with regards to alleged child abuse by people outside our setting are similarly displayed when staff are accused of abuse. All staff are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are explicit in the Staff Code of Conduct 2023. The setting works in accordance with SET procedures (ESCB 2022) in respect of allegations against an adult working with children (in a paid or a voluntary capacity). This applies to both current and past members of staff.

In the safeguarding training, explicit requirement is made of staff not to place themselves in vulnerable situations with students. Scenarios and situations exploring exactly what that means are discussed. Our setting recognises that the term ‘**Reasonable Force’** covers a broad range of actions and that there are circumstances when it is appropriate to use reasonable force to safeguard an individual or other people. Therefore, our provision works in accordance with statutory and local ESCB guidelines and recognises that when intervention is required that it is a safeguarding issue. In general, staff are specifically required not to place their hands on children unless they have employed all other safe strategies to stop a child or young person hurting themselves or others and those strategies have either not worked or are not employable in that situation. Where staff find it necessary to physically intervene, they must report any such physical intervention immediately to a DSL and to follow by a written report by the end of the day to the DSL who will assess the situation and take appropriate action in line with the guidance referenced above. In addition, where necessary, the setting will develop individual safety plans for vulnerable children and young people to try and minimize challenging behaviour and the learning from such risk assessments will be shared with appropriate staff and updated regularly.

Regards personal and intimate care – there are some members of staff who are specifically trained and employed to undertake such care. There will be specific reference to this in their job descriptions. In general, other staff will not provide personal or intimate care unless in exceptional circumstances, in which case the intervention will be reported immediately, with a written report to follow to the DSL with 24 hours.

Staff working one to one will ensure that there is a window into the room, or that the door is left open and that children and young people, where possible, are sat closest to the door, and that they can leave without being physically prevented from doing so. However, any child who leaves without permission or is upset, then advice and support must be sought by contacting a DSL.

Staff supervising children and young people on trips must adhere to the specific conditions of the trip risk assessments, including assuring that only gender appropriate staff if help or first aid is required. Any such incident must be reported immediately to the trip leader, and the learner emergency contact,

If an allegation is made against a member of staff that concern will be immediately relayed to the Director of Service and Operations.

Staff, and former staff are not allowed to interact with children and young people that attend our setting directly via social media. This means that a member of staff or ex member of staff should not interact with children and young people on our roll as if they are friends for any reason. Additionally former stakeholders should not be accepted onto any private social media accounts until at least 3 years have passed since their last day on roll. No former stakeholder under the age of 18 should ever be accepted onto a private social media account regardless of their time out of the setting.

More information can be found in our Online Safety Policy regarding this issue and in addition staff have signed the *staff (and volunteer) acceptable use policy agreement*.

Any volunteer working in the setting will have an enhanced DBS and a risk assessment as per our Volunteers Policy. (See Appendix 4)

Only authorised agencies may investigate allegations of abuse against staff. This also pertains to ex staff. Whilst it is permissible to ask simple non-leading questions to ascertain the facts of the allegation, formal interviews and the taking of statements are not allowed in the first instance and may only be undertaken subsequently following direction from the Essex LADO.

The procedure to be followed in the event of an allegation made against a member of staff is set out in Section 7 of the SET procedures.

Recording of allegations on staff files is done in line with Section 5, ‘Working Together’ 2023 guidance, and although we are a CIC organisation, we will refer allegations to the Essex Local Authority Designated Officer to support further measures as required. We also recognise that allegations can be unsubstantiated and malicious but follow SET procedures in all cases. Specifically, referrals to the Essex LADO will be made where it is alleged that a person who works with children has behaved in such a way that has harmed, or may have harmed a child (where a child is defined as being aged 0 – 19); possibly committed a criminal offence against or related to the child; behaved towards a child in such a way that indicates that s/he may pose a risk of harm to children or might not be suitable to work with children. The issue of transferable risk is important here and it may be that an allegation refers to an incident outside of our setting which did not involve children but could have an impact on their suitability work with children. It is the DSL’s responsibility to decide whether an allegation is an indicator that a child has been or may have been harmed by a member of staff.

Where an allegation against a member of staff has been made that is an allegation of abuse the Designated Safeguarding Lead will immediately call the Children’s Workforce Allegations Management Team on 03330 139 797. A Local Authority Designated Officer (LADO) will advise on how to proceed and whether the matter requires police involvement. This will include advice on speaking to children and young people and parent/carers. This allegation will always be discussed with parents, and the welfare of the child will always be considered paramount when deciding what course of action to take.

This referral route follows SET procedures (ESCB 2022) and will be processed within one working day.

If an allegation of abuse is made against the Directors, then the concern must be raised with The Chair of Governors, who must follow the same procedures above.

All staff must understand that certain documentation pertaining to keeping children safe in our setting will be kept, recorded and monitored via our Single central record, which is maintained by our Director of Operations. This is a key safeguarding document and the information kept is essential to the safeguarding of children and young people in the school. Information held in this record can be disclosed to outside agencies if required.

Appendix 3 shows the flowchart to be followed in the initial management of any allegations made about staff or volunteers at The Peaceful Pony.

**Disqualification by Association -** Staff are given information and advice regards the meaning of this term and how it may apply to them, even though we are not a provision that hosts any childcare or teaching of children aged under 5. This information and advice is based on The Childcare Act (2006, amended in 2018).

**Whistle blowing or Freedom to Speech –** This is ‘making a disclosure in the public interest’. It occurs when a member of the setting’s community raises a concern about the actions or attitude of an adult who works with children.

All staff must be aware of their duty to raise concerns about the attitude or actions of colleagues in line with the **settings Code of Conduct and Whistleblowing Policy**. All staff should feel able to raise concerns about poor or unsafe practice and feel confident that any concern will be taken seriously by the school leadership team. If any member of staff has a concern about another member of staff they should raise the concern with the Lead DSL. If they have ongoing concerns, they should raise the issue with the nominated ‘safeguarding’ Lead or Director. staff member can press for a reconsideration of a case if they feel the situation does not appear to be improving. They must refer their concerns as already explained, if they have concerns for the safety of a child.

## Use of premises for non-provision activities

Where our site is used by external organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we ensure that appropriate arrangements are in place to keep children safe. When services or activities are provided under the direct supervision or management of provision staff, all usual arrangements for child protection will apply.

Where services or activities are provided separately by another body on our site we will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the provision on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

We want everyone to feel able to report any child protection or safeguarding concerns. However, for members of staff who feel unable to raise these concerns internally, they can call NSPCC’s Whistleblowing helpline on 0800 028 0285 or email help@nspcc.org.uk. Parents or other members of the public and also raise concerns via the NSPCC calling their general helpline on 0808 800 5000 or emailing help@nspcc.org.uk As stated previously, all staff are provided with the LADO’s number on their yellow cards and it is made clear that staff can report any concerns they have direct to the LADO.

## Information Sharing

Our setting will share information with The Children and Families Hub and the police freely if the issue is a safeguarding concern. Information with staff will be shared on a ‘need to know basis’ and in accordance with individual risk assessments as required. The setting will receive safeguarding information from partner agencies, and in accordance with SET procedures will not be required to notify parents/carers that this information has been received. The setting will also pass on confidential safeguarding information to new institutions if a child/young person should leave The Peaceful Pony for another place of education, and request potential safeguarding information from other institutions as children/young people arrive newly on our roll. This is also in accordance with SET procedures.

## Keeping Parents informed

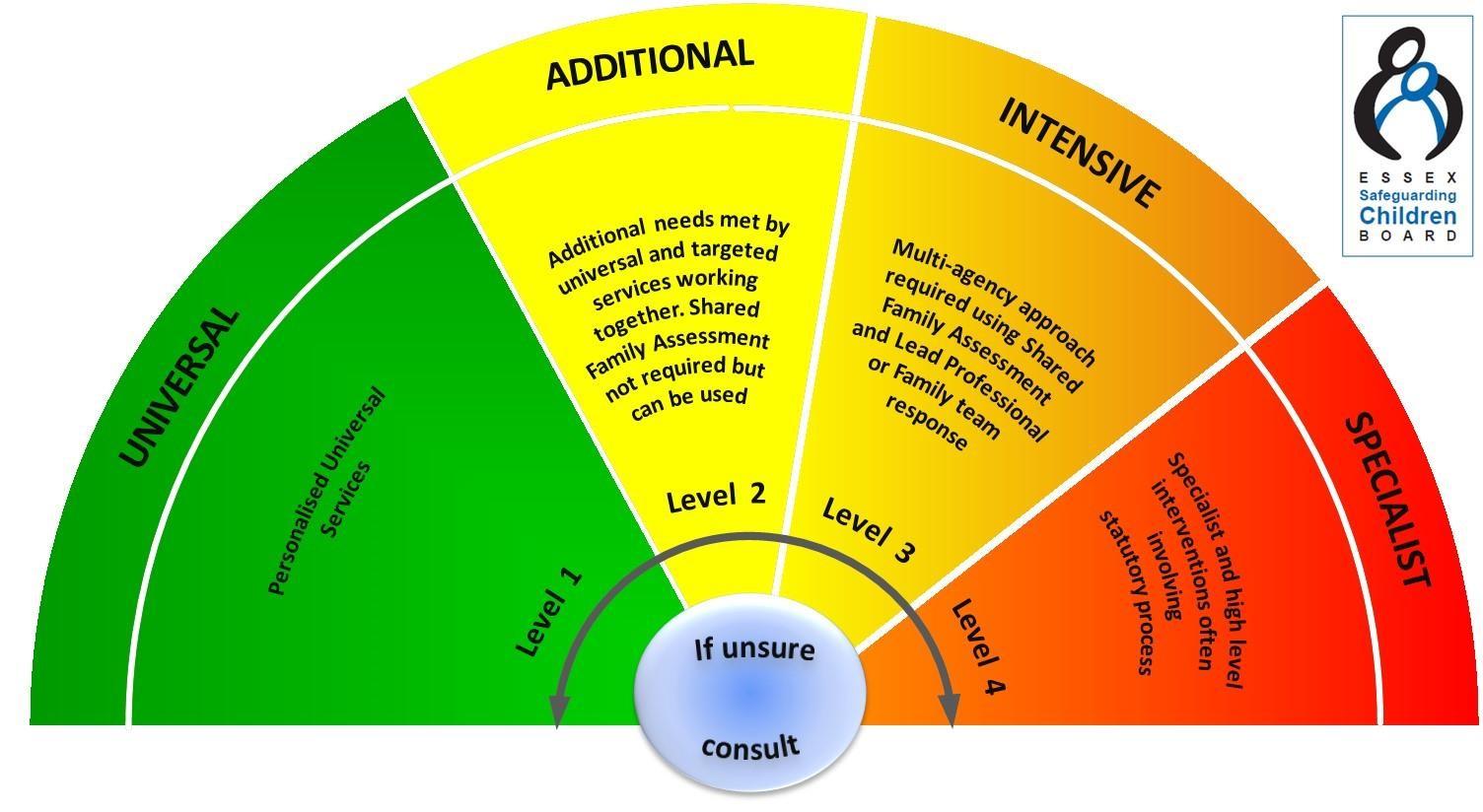
Our Setting will seek to help parents understand what is required by law in terms of safeguarding, and how The Peaceful Pony seeks to protect children, and the procedures that must be followed. There is a section on the website related to Safeguarding and Child Protection procedures, and issues regarding safeguarding are referred to in the Parent Newsletter at regular intervals. Unless informing parents’ places children and young people at risk of significant harm, parents will always be informed when a significant concern has been raised about their child. The only exceptions to this rule are: if the DSL has specifically been told not to inform the parent either by Social care or the Police, or if the issue is **not** an abuse issue, and the child or young person is aged 14+, is judged as being competent to make their own decisions, and does not want the parent to be informed (Fraser Competence ruling).

## Policy Review

The Director of Service and Named Safeguarding Lead is responsible for the annual review of this policy. It is reviewed every year or whenever deemed necessary.

**Appendix 1:**

**Guide to Interventions and support for children and young people** (Linked to “Effective Support for Children and Families in Essex” 2017).



The following document outlines effective support for children and families in Essex. It is a guidance document for all practitioners in working together with children and families to provide early help, targeted and specialist support. We refer to this document and the support listed when assessing the most suitable intervention for a child and/or family. [view\_doc.aspx (essex.gov.uk)](https://secureapps.essex.gov.uk/Freedom_of_information/view_doc.aspx?DocID=36767)

**We are also able to access Early Help Drop-ins** [**-** Concerns about the welfare of a child](https://www.escb.co.uk/2414)

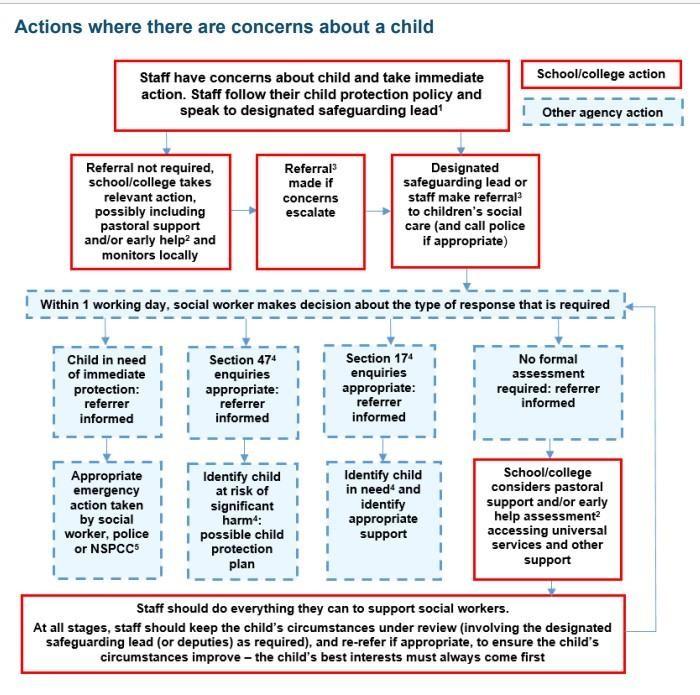
[(escb.co.uk)](https://www.escb.co.uk/2414)



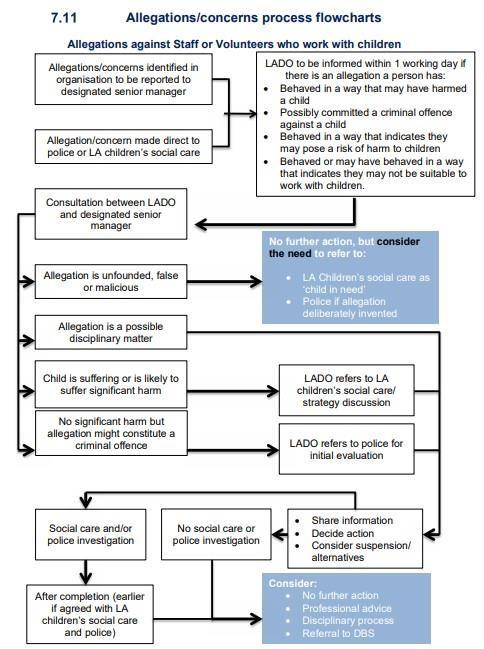
**EFFECTIVE INTERVENTION PROCESS DIAGRAM**

You have identified a need a level 1, which can be met by an Alt Ed Lead.


## Appendix 2 – taken from KCSIE 2023



**Appendix 3**



[set-procedures-may2022.pdf (escb.co.uk) –](https://www.escb.co.uk/media/2739/set-procedures-may2022.pdf) Part 7 “Allegations/concerns process flowchart” **Essex Duty**

**LADO number: 03330 139 797**

**LADO@essex.gov.uk**

### Allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a volunteer or contractor, 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

 Behaved towards a child or children in a way that indicates they 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 – this includes behaviour taking place both inside and outside of our setting

If we’re in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the settings premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

### Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

 Redeployment within the setting so that the individual does not have direct contact with the child or children concerned

 Providing an assistant to be present when the individual has contact with children

 Redeploying the individual to alternative work in the setting so that they do not have unsupervised access to children

 Moving the accused to another site (where possible) where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

If in doubt, the case manager will seek views from the setting’s personnel adviser and the designated officer at the local authority, as well as the police and children’s social care where they have been involved.

### Definitions for outcomes of allegation investigations

 **Substantiated:** there is sufficient evidence to prove the allegation

 **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

 **False:** there is sufficient evidence to disprove the allegation

 **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

 **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

 Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below

 Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

 Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

 Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the setting is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate

 Where the case manager is concerned about the welfare of other children in the community or the individual’s family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children’s social care

 **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the setting and their contact details

 **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

 **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in the setting and/or liaise with the police and/or children’s social care services as appropriate

 Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

 Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing.

 Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

 Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the setting is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from our site.

Where the police are involved, wherever possible the setting will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the setting’s disciplinary process, should this be required at a later point.

### Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

 Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

 If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

 If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### Specific actions Action following a criminal investigation or prosecution

The case manager will discuss with the local authority’s designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children’s social care services.

### Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the setting ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the setting will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of Alt Ed staff, the setting will consider whether to refer the matter to the relevant agency, Therapy board.

### Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual’s contact with the child or children who made the allegation, if they are still attending the setting.

### Unsubstantiated, unfounded, false or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children’s social care may be appropriate

Shown to be deliberately invented, or malicious, the setting will consider whether any disciplinary action is appropriate against the individual(s) who made it **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

 Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children’s social care may be appropriate

 Shown to be deliberately invented, or malicious, the setting will consider whether any disciplinary action is appropriate against the individual(s) who made it

### Confidentiality and information sharing

Our setting will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children’s social care services, as appropriate, to agree:

* Who needs to know about the allegation and what information can be shared
* How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
* What, if any, information can be reasonably given to the wider community to reduce speculation
* How to manage press interest if, and when, it arises

### Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual’s confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual’s personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

* A clear and comprehensive summary of the allegation
* Details of how the allegation was followed up and resolved
* Notes of any action taken, decisions reached and the outcome
* A declaration on whether the information will be referred to in any future reference

In these cases, the setting will provide a copy to the individual, in agreement with children’s social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### References

When providing employer references, we will:

 Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

 Include substantiated allegations, provided that the information is factual and does not include opinions

### Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority’s designated officer to determine whether there are any improvements that we can make to the setting’s procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

* Issues arising from the decision to suspend the member of staff
* The duration of the suspension
* Whether or not the suspension was justified
* The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority’s procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the setting that they were abused as a child, we will advise the individual to report the allegation to the police, unless the alleged perpetrator is still known to the setting in which case we would follow the procedure outlined above.

### Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

 Suspicion

 Complaint

 Safeguarding concern or allegation from another member of staff

 Disclosure made by a child, parent or other adult within or outside the setting Preemployment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### Definition of low-level concerns

The term ‘low-level’ concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

 Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

 Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority Examples of such behaviour could include, but are not limited to:

 Being overly friendly with children

 Having favourites

 Taking photographs of children on their mobile phone

 Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

Humiliating pupils



### Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

 Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

 Empowering staff to share any low-level concerns

 Empowering staff to self-refer

 Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

 Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

 Helping to identify any weakness in the settings’s safeguarding system

### Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

 Directly to the person who raised the concern, unless it has been raised anonymously

 To the individual involved and any witnesses

The Named Safeguarding Lead will use the information collected to categorise the type of behaviour and determine any further action, in line with the setting’s staff code of conduct and Disciplinary Policy as appropriate. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

### Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

* + - * + Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
    - Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
    -  Retained at least until the individual leaves employment at the setting
    - Where a low-level concern relates to a contractor, we will notify the individual’s employer, so any potential patterns of inappropriate behaviour can be identified.

### References

We will not include low-level concerns in references unless:

 The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

 The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

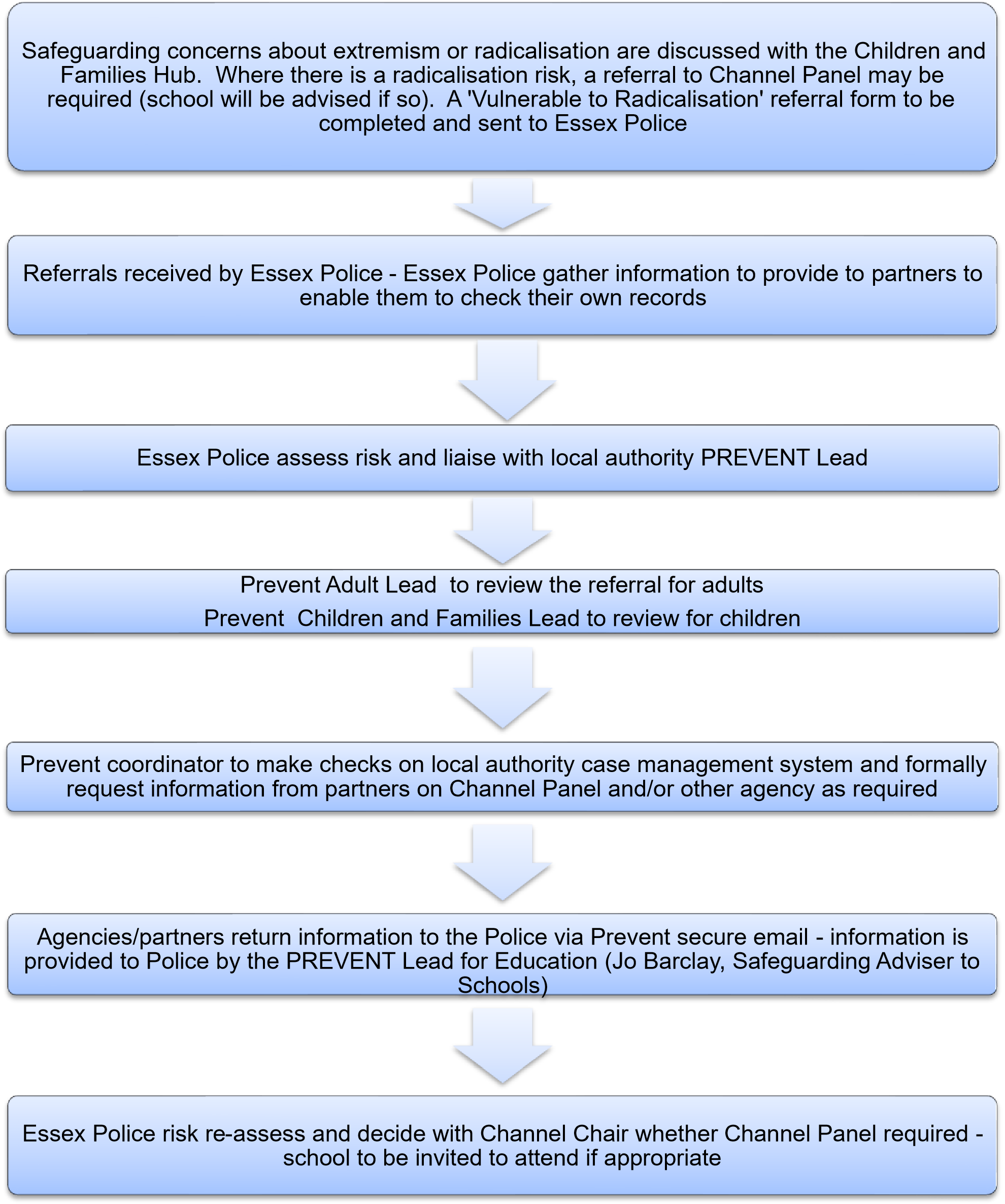
### Appendix 4 Policy for Inducting Volunteers to The Peaceful Pony

This policy is written using *Keeping Children Safe in Education* 2023 as guidance.

Any member of staff wishing to host a volunteer to work in the setting with students, must follow this protocol:

1. Volunteer (and staff host) to be interviewed by one of the Designated Safeguarding Leads for the school.
2. During the interview, DSLs must have regard for Safer Recruitment issues and be up to date with Safer Recruitment training.
3. If the volunteer is deemed suitable to work here, the DSL must complete a **Volunteer Risk Assessment** (
4. The host must arrange for the volunteer to meet with KWH and produce the required documents – our policy is that any adult (aged 16+) without a DBS cannot be in the setting unsupervised. If the volunteer has the appropriate DBS then they can go about their daily timetable unsupervised, but should have regular debriefing points built into the duration of their work (see point 9 below).
5. The DSL will arrange further meetings with the volunteer once they start to do safeguarding training and give them a set time to complete PREVENT training.
6. On the day the volunteer starts, the host should introduce them to CC.
7. Prior to them starting the host should make all other staff aware via notices and staff briefing. If the volunteer needs more complete access this needs to be logged on the risk assessment with the reasons why – care should be taken with volunteers who may have family or friends at the school where it is possible that personal data of students and parents could be accessed. The host also needs to bear this in mind if the volunteer works out of any office space and should take care to ensure that any access to confidential/personal data is closed before the volunteer can access the computer.
8. On the day of starting –to arrange for a temporary ID and lanyard to be made and issued.
9. The host will be the volunteer’s mentor, and for the duration of the volunteer’s work with TPP, will be responsible for mentoring the volunteer, providing supervision in terms of giving them a safe time to unload any concerns or emotional impact they have – especially if this is the first time that they have worked with children and young people, and passing on any concerns about the volunteer’s conduct to the DSL team.
10. The host will also provide an exit interview for the volunteer when their work is finished with us, looking for things they enjoyed and anything they would like to say about ‘even better if’. In addition, if the host can pass on any ideas about how to make this package easier to manage, then they should do so. The exit interview should be noted in an email to the DSL team.

## APPENDIX 5 – PREVENT Referral Flowchart



|  |  |
| --- | --- |
| **REFERRAL PROCESS** | |
| **By sending this form you consent for it to arrive with both your dedicated Local Authority safeguarding team & Prevent policing team for a joint assessment.** Wherever possible we aim to give you feedback on your referral, please be aware, however, that this is not always possible due to data-protection & other case sensitivities.  Once you have completed this form, please email it to**: Prevent@essex.police.uk**  If you have any questions whilst filling in the form, please call: **01245 452196** | |
| **INDIVIDUAL’S BIOGRAPHICAL & CONTACT DETAILS** | |
| **Forename(s):** | First Name(s) |
| **Surname:** | Last Name |
| **Date of Birth (DD/MM/YYYY):** | D.O.B. |
| **Approx. Age (if DoB unknown):** | Please Enter |
| **Gender:** | Please Describe |
| **Known Address(es):** | Identify which address is the Individual’s current residence |
| **Nationality / Citizenship:** | Stated nationality / citizenship documentation (if any) |
| **Immigration / Asylum Status:** | Immigration status? Refugee status? Asylum claimant? Please describe. |
| **Primary Language:** | Does the Individual speak / understand English? What is the Individual’s first language? |
| **Contact Number(s):** | Telephone Number(s) |
| **Email Address(es):** | Email Address(es) |
| **Any Other Family Details:** | Family makeup? Who lives with the Individual? Anything relevant. |
| **DESCRIBE CONCERNS** | **In as much detail as possible, please describe the specific concern(s) relevant to Prevent.** |
| Please Describe |  |



|  |  |
| --- | --- |
| **FOR EXAMPLE:**     * How / why did the Individual come to your organisation’s notice in this instance? * Does it involve a specific event? What happened? Is it a combination of factors? Describe them. • Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? Where? When? How? * Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact? * Is there something about the Individual’s mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information? • Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly? * Has the Individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider *any* extremist ideology, group or cause, as well as support for “school-shooters” or public-massacres, or murders of public figures. • Please describe any other concerns you may have that are not mentioned here. | |
| **COMPLEX NEEDS** | **Is there anything in the Individual’s life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense?** |
| Please Describe | |
| **FOR EXAMPLE:**     * Victim of crime, abuse or bullying. * Work, financial or housing problems. * Citizenship, asylum or immigration issues. * Personal problems, emotional difficulties, relationship problems, family issues, ongoing court proceedings. * On probation; any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency. * Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories. * Educational issues, developmental or behavioural difficulties, mental ill health (see **Safeguarding Considerations** below). * Please describe any other need or potential vulnerability you think may be present but which is not mentioned here. | |
| **OTHER INFORMATION** | **Please provide any further information you think may be relevant**, **e.g. social media details, military service number, other agencies or professionals working with the Individual, etc..** |
| Please Describe | |

