

SAFEGUARDING POLICY 2024

Policy date: April 2023

Policy reviewed date: April 2024/June 2024

The Create Approach Ltd is an online 1: 1 mentoring provision and does not currently provide physical face to face or group. A parent is present during sessions. Aspects of this policy have been written to accommodate any possible future changes.

KEY CONTACT

Kelly Sherman is the founder of The Create Approach Ltd and is the only employee. No other staff are employed, no subcontractors are used and no volunteers are used to support. All mentoring is conducted virtually on a 1:1 basis with a learner with a parent present.

Designated safeguarding lead

Kelly Sherman

kelly@thecreateapproach.co.uk



Introduction & policy aims

Child Protection and Safeguarding Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all learners attending The Create Approach Ltd. We will endeavour to provide a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection, and justice.

Some key safeguarding documents, guidance, policy templates and audit tool kits are also available via the NSCP website under Resources. This policy is also written with the support of reference to Pan Dorset Safeguarding Children Partnership - <https://pdscp.co.uk/>

The Create Approach Ltd will:

- Protect children and young people who receive The Create Approach Ltd's services from harm. This includes the children of adults who use our services.
- Provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

As per the introduction statement The Create Approach Ltd comprises of one person, the founder. If in the future this were to change, this policy would apply to anyone working on behalf of The Create Approach Ltd, including senior managers paid staff, volunteers, sessional workers, agency staff and students. Failure to comply with the policy and related procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

Overview

This Child Protection Policy will be reviewed by the Senior Designated Safeguarding Lead Kelly Sherman, DSL, on a regular basis to ensure it remains current and incorporates all revisions made to local or national safeguarding guidance. This policy will be fully reviewed as a minimum once a year.

Our policy applies to all staff, governors and volunteers working at The Create Approach Ltd and takes into account statutory guidance provided by the Department for Education, local guidance issued by Dorset and BCP council/local authorities and a chief officer of police for a police area in the local LA area.

We will ensure that all parents/carers are made aware of our responsibilities regarding child protection procedures and how we will safeguard and promote the welfare of their children through the publication of this child protection policy on our website.

These duties and responsibilities, as set out within the Education Act 2002 sec175 and 157, DfE Statutory Guidance Keeping Children Safe in Education 2023 and HM Working Together to Safeguard Children 2018 (updated December 2020) are incorporated into this policy.

The Create Approach Ltd is an alternative provision that supports the reintegration of young people back into mainstream educational provision, either from their original school or to transition into an alternative placement. The main safeguarding priorities remain with the school for which the young person is on roll, or the local authority if a child or young person is not on roll. The Create Approach Ltd is not the main provider of alternative provision support. The Create Approach Ltd will support and collaborate in all instances and maintain professional standards and procedures as if it were a mainstream provision. In all references and points of this policy this ethos will apply.

The Create Approach Ltd abides by the duty of care to safeguard and promote the welfare of children and young people and is committed to safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements.

- We recognise the welfare of children is paramount in all the work we do and in all the decisions we take.
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation has an equal right to protection from all types of harm or abuse.
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

This child protection policy forms part of a suite of policies and other documents which relate to the wider safeguarding responsibilities of the learning centre. It should be read in conjunction with policies such as the:

- Staff behaviour policy (code of conduct).
- E-safety policies for learners and staff, which include use of mobile technology.
- Safer recruitment policy and procedures.
- Procedures to handle allegations against members of staff and volunteers, including referring to the Disclosure and Barring Service (when appropriate).
- Whistle blowing policy.

- Anti-bullying procedures.

This policy is to be used in conjunction with the Pan-Dorset Safeguarding Children Partnership policies and procedures manual found by clicking [HERE](#).

The Create Approach Ltd is also signed up for update notifications to this manual.

In safeguarding children, The Create Approach Ltd is committed to the principles required for adherence by BCP council, Dorset Council and any other organisation within with The Create Approach Ltd supports and works for and alongside.

The Create Approach Ltd will perform an annual audit of its Safeguarding and Child Protection arrangements and will adapt as required.

All children have the right to be safeguarded from harm or exploitation whatever their

- Age.
- Health or disability.
- Gender or sexual orientation.
- Race, religion, belief or first language.
- Political or immigration status.

Staff and regular volunteers at this centre understand the importance of taking appropriate action and working in partnership with children, their parents/carers and other agencies to safeguard children and promote their welfare.

Aim of The Create Approach Ltd Child Protection Policy

There are seven main elements to our policy:

1. Providing a safe environment in which children can learn and develop.
2. Ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with children.
3. Developing and then implementing procedures for identifying and reporting cases, or suspected cases of abuse in and outside of support from The Create Approach Ltd.
4. Supporting pupils who have social care involvement in accordance with his/her child in need plan, child protection plan or are subject to Local Authority Care.
5. Raising awareness of safeguarding children, child protection processes and equipping children with the skills needed to keep them safe in and outside of The Create Approach Ltd.
6. Working in partnership with agencies and safeguarding partners in the 'best interest of the child'.
7. Ensuring we have appropriate policies and procedures to deal with child-on-child sexual violence and sexual harassment and LGBT policies.

In addition, we aim to:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to and heard.
- Ensure children know that there are trusted adults at the centre who they can approach if they are worried.
- Ensure that every effort is made to establish effective working relationships with parents, carers, and colleagues from other agencies.
- Include opportunities for children to develop the skills they need to recognise and stay safe from abuse by:
 - Recognise and managing risks including online safety, radicalisation and extremism, sexual exploitation, child on child sexual violence and sexual harassment, the sharing of nude and semi-nude images which has replaced what was termed as sexting.
 - Support the development of healthy relationships and awareness of domestic violence and abuse, recognising that Domestic Abuse can encompass a wide range of behaviours and may involve a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional harm and children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- Recognising how pressure from others can affect their thoughts, feelings and responses.
- Knowing that as an alternative provision we will act swiftly to address any concerns related to serious violence, gang and knife crime or child on child sexual violence or sexual harassment incidents and work closely in collaboration for the school of which a child is on roll.
- Ensuring our emotion and support policy includes measures to prevent bullying, including cyberbullying, harmful online challenges, hoaxes, prejudice-based and discriminatory bullying.
- Maintain an on-line safety policy, which take into account remote learning, and use of mobile and smart technology and is reviewed regularly to take into account any new threats.
- KCSiE 2022 broadened the response required to address any 'harm outside the home' also known as 'extra familial harm'. The Create Approach Ltd is a place of protection and where children and young people can share concerns and seek support and are place of safety and where children and young people can form safe and trusted relationships. Through creating a whole centre ethos

and sharing good communication with safeguarding partners and services, children and young people can feel assured they will be listened to, heard, and offered support to enable them share sensitive information and strengthen their resilience.

- The Create Approach Ltd will work together with parents, carers, and external services to form strong and trusted partnerships which can advocate trauma informed and trauma aware responses and where trusted relationships can be formed and go on to create safe places and spaces within the community, so children and young people know how to access a place of safety outside of The Create Approach Ltd environment if needed.
- We will take all reasonable measures to ensure any risk of harm to children's welfare is minimised inside and outside of The Create Approach Ltd environment.
- The Create Approach Ltd will take all appropriate actions to address concerns about the welfare of a child, working to local policies and procedures in full working partnership with agencies and following the Pan-Dorset Safeguarding Children Partnership - Pan-Dorset Safeguarding Children Partnership (pdscp.co.uk)
- Ensure robust child protection arrangements are in place and embedded in the daily life and practice of The Create Approach Ltd.
- Promote learner health and safety.
- Promote safe practice, and challenge unsafe practice.
- Ensure that procedures are in place to deal with allegations of abuse against facilitators and other staff including volunteers, supply staff and contractors.
- Provide first aid and meet the health needs of children with medical conditions.
- Ensure site security.
- Address drugs and substance misuse issues.
- Support and plan for young people in custody and their resettlement back into the community.
- Work with all agencies regarding missing children, anti-social behaviour/gang activity and violence in the community/knife crime and children at risk of sexual exploitation.

- Everyone having a duty to safeguard children inside/outside The Create Approach Ltd environment including trips, extended activities, vocational placements, and liaison with other alternative education packages.

We will follow the procedures set out by the Pan-Dorset Safeguarding children partnership and take account of guidance issued by the DfE in Keeping Children Safe in Education to:

- The Create Approach Ltd will have a Senior Designated Safeguarding Lead (DSL) who has received appropriate training and support for this role and will be a designated facilitator for LAC.
- Ensure every member of staff (including temporary, supply staff and volunteers) knows the name of the Designated Safeguarding Lead, Kelly Sherman, and their deputies responsible for child protection, and their role.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the Designated Safeguarding Lead, or to children's social care/police if a child is in immediate danger.
- Ensure all staff and volunteers are aware of the early help process and understand their role in making referrals or contributing to early help offers and arrangements.
- Ensure that there is a whistleblowing policy and culture where staff can raise concerns about unsafe practice, and that these concerns will be taken seriously.
- Ensure that there is a complaints system in place for children and families.
- Ensure that parents understand the responsibility placed on the centre and staff for child protection and safeguarding by sharing this document on our website.
- Notify Children's Social Care if there is an unexplained absence for a child who is subject to a child protection plan and where no contact can be established with the child, or a parent or appropriate adult linked to the child or mainstream provision from which the child is on roll.
- Develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at child protection conferences where possible and applicable.
- Keep written records of concerns about children, even where there is no need to refer the matter immediately; documenting and collating information on individual children to support early identification, referral, and actions to safeguard.

- Ensure all records are kept securely as per further information below.
- Ensure that we follow robust processes to respond when children are missing from education or missing from home or care.
- Develop and then follow procedures where an allegation is made against a member of staff or volunteer.
- Ensure safe recruitment practices are always followed.
- Apply confidentiality appropriately.
- Apply the NSCP escalation procedures if there are any concerns about the actions or inaction of social care staff or staff from other agencies.

Maintaining a child centred and coordinated approach to safeguarding:

Everyone who works at The Create Approach Ltd understands they are an important part of the wider safeguarding system for children and accepts safeguarding and promoting the welfare of children is everyone's responsibility and everyone who has contact with children and their families has a role to play. To fulfil this responsibility effectively, all our staff, including supply staff and volunteers will ensure their approach is **child-centred** and will be supported to consider, always, what is in the best interests of the child.

The actions we take to promote the welfare of children and protect them from harm are everyone's responsibility. However, we recognise 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 encounters them has a role to play** in identifying concerns, sharing information, and taking prompt action.

Safeguarding and promoting the welfare of children is defined 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.
- Taking action to enable all children to have the best outcomes.

NB Definition: Children includes everyone under the age of 18.

Safeguarding legislation and policy

The Create Approach Ltd provides online SEMH and learning mentoring support 1:1 with a young person and their parent present.

This policy has been supported by the following policies which should also be referred to for guidance:

- Keeping children safe in education 2023

https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping_children_safe_in_education_2023.pdf

https://assets.publishing.service.gov.uk/media/64f0a84da78c5f000dc6f3b4/Keeping_children_safe_in_education_2023_-_part_one.pdf

- The Childrens Act 1989 and 2004 amendment

<https://www.legislation.gov.uk/ukpga/1989/41/contents>

<https://www.legislation.gov.uk/ukpga/2004/31/contents>

- Section 5B(11) of the Female Genital mutilation Act 2003 as inserted by section 74 of the Serious Crime act 2015, which places a statutory duty on teachers (education staff) to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.

https://assets.publishing.service.gov.uk/media/5a8086f2ed915d74e33faefc/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

<https://www.gov.uk/government/collections/serious-crime-bill#:~:text=To%20help%20stop%20FGM%20and,girl%20from%20risk%20of%20FGM>

- The rehabilitation of offenders act 1974 which outlines when people with criminal convictions can work with children.

<https://www.gov.uk/government/publications/new-guidance-on-the-rehabilitation-of-offenders-act-1974>

- Schedule 4 of the safeguarding vulnerable groups act 2006, which defines what regulated activity is with children.

<https://www.legislation.gov.uk/ukpga/2006/47/schedule/4>

- Statutory guidance on the prevent duty which explains duties under the counter-terrorism and security act 2015 with respect to protecting people from risk of radicalisation and extremism.

https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Web_1_.pdf

- The Human Rights Act 1998 which explains that being subjected to harassment, violence and/or abuse including that of a sexual nature may breach any or all of the rights which apply to individuals under the European Convention on Human Rights.

<https://www.legislation.gov.uk/ukpga/1998/42/contents>

<https://www.coe.int/en/web/human-rights-convention>

- The Equality Act 2010 which makes it unlawful to discriminate against people regarding particular protected characteristics, including disability, sex, sexual orientation, gender reassignment and race. This means all facilitators should carefully consider how they are supporting learners with regards to these characteristics. The act allows for those that support young people to take positive action to deal with particular disadvantages affecting young people. This includes making reasonable adjustments for disabled children. For example, it could include taking positive action to support girls' where there is evidence that they are being disproportionately subjected to sexual violence or harassment.
- The Public Sector Equality Duty (PSED) which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve young people's outcomes. Some young people may be more at risk of harm from issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination.

<https://www.gov.uk/government/publications/public-sector-equality-duty>

- Working together to safeguard children 2023:

https://assets.publishing.service.gov.uk/media/65803ff395bf65000d7191a2/Working_together_to_safeguard_children_2023_-_summary_of_changes.pdf

This policy also takes into account the following documents to support. For detailed information please click on the links:

Pan Dorset Safeguarding children partnership - <https://pandorsetscb.proceduresonline.com/index.html>

Working together to safeguard children - <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Keeping children safe in education - <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Working together to safeguard children - <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Definitions

The Children Act 1989 definition of a child is: anyone who has not yet reached their 18th birthday, even if they are living independently, are a member of the armed forces or is in hospital.

Child and Adult Abuse:

Children and adults may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their daily lives. There are 4 main categories of abuse, which are: sexual, physical, emotional abuse, and neglect. It is important to be aware of more specific types of abuse that fall within these categories, they are:

- Bullying and cyberbullying
- Child sexual exploitation
- Child Criminal exploitation
- Child trafficking
- Domestic abuse
- Female genital mutilation
- Grooming
- Historical abuse
- Online abuse

Safeguarding children:

Safeguarding children is defined in [Working Together to Safeguard Children 2018](#) as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

The Create Approach Ltd will act in accordance with the 'Keeping children safe in education 2023 statutory guidance' and promote the welfare of children in this alternative education support service.

Child protection:

Refers to activities undertaken to prevent children suffering or being likely to suffer significant harm.

Abuse

Is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Neglect

Is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Sharing of nudes and semi-nudes

This is also known as sexting or youth-produced sexual imagery. This is where children share nude or semi-nude images, video's or live streams.

The Prevent duty:

Some organisations in England, Scotland and Wales have a duty, as a specified authority under section 26 of the Counterterrorism and Security Act 2015, to identify vulnerable children and young people and prevent them from being drawn into terrorism. This is known as the Prevent duty. These organisations include:

- Schools.
- Registered childcare providers.
- Local authorities.
- Police.
- Prisons and probation services.
- NHS trusts and foundations.
- Other organisations may also have Prevent duties if they perform delegated local authority functions.

Children can be exposed to different views and receive information from various sources. Some of these views may be considered radical or extreme.

Radicalisation is the process through which a person comes to support or be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is a form of harm.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Victim

Is a widely recognised term, but it is understood that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident we will be prepared to use any term that a child feels most comfortable with.

Alleged perpetrator(s)

A recognised term, however, the use of this terminology will be thought carefully about, especially in front of children, as in some cases abusive behaviour can be harmful to the perpetrator too. What's appropriate will need to be carefully considered on a case-by-case basis.

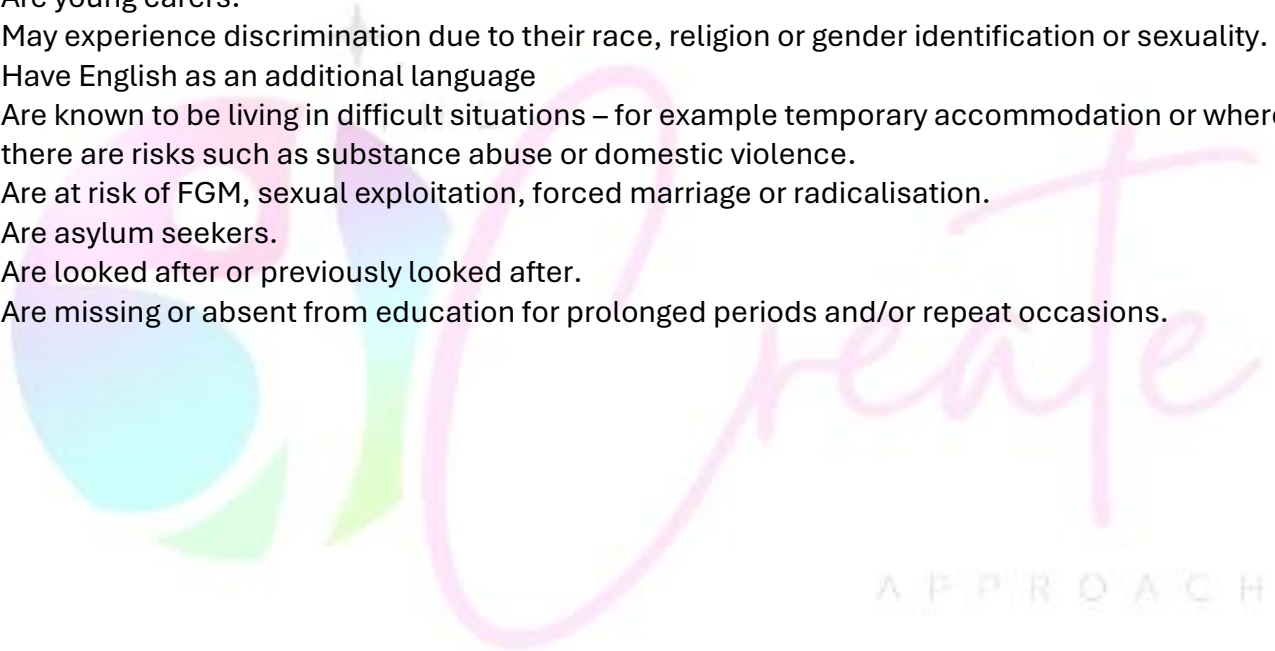
Equality statement

Some children may be at an increased risk of abuse both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it.

The Create Approach Ltd is committed to anti-discriminatory practices and recognises children's diverse circumstances. We ensure all children have the same protection, regardless of any barriers they may face.

Special consideration to children who:

- Have special education needs and or disabilities or health conditions (whether or not they have an Education, Health and Care Plan).
- Are at risk due to either their own or family member's mental health.
- Are young carers.
- May experience discrimination due to their race, religion or gender identification or sexuality.
- Have English as an additional language
- Are known to be living in difficult situations – for example temporary accommodation or where there are risks such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage or radicalisation.
- Are asylum seekers.
- Are looked after or previously looked after.
- Are missing or absent from education for prolonged periods and/or repeat occasions.



Roles and Responsibilities

The Create Approach Ltd outlook on safeguarding:

- We understand the importance every member of our staff has through their contact with children in and outside of our school environment and the particular importance of the roles and relationships they have which places them in a position to identify concerns early, provide help for children and promote children's welfare and prevent concerns from escalating.
- We, The Create Approach Ltd, recognise we have a responsibility to provide a safe environment in which children/young people can learn.
- We will make every effort to identify children who may benefit from early help and put in place support as soon as a problem emerges at any point in a child's life.
- **Any staff member** who has **any** concerns about a child's welfare should follow the processes set out in this child protection policy and raise concerns with the designated safeguarding lead without delay.
- All our staff should expect to support social workers and other agencies following any referral, especially if they were involved in being alert to or receiving a disclosure of risk, harm or abuse or harassment from a child.
- Our senior designated safeguarding lead, Kelly Sherman, DSL, will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care, police, early help, and health where required, as the designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

Safeguarding is not just about protecting children from deliberate harm. It also relates to the broader aspects of care and education including:

- Learners' health and safety and emotional well-being, and their mental and physical health or development.
- Meeting the needs of children with special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of children with medical conditions.
- Providing first aid.
- Educational visits and off- site education.
- Intimate care and emotional wellbeing.
- On-line safety and associated issues.

- Appropriate arrangements to ensure centre security, taking into account the local context.
- Keeping children safe from risks, harm, exploitation and sexual violence and sexual harassment between children: KCSiE 2023, pg 152.

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding policy guidance - https://assets.publishing.service.gov.uk/media/64f0a84da78c5f000dc6f3b4/Keeping_children_safe_in_education_2023_-_part_one.pdf - and review the guidance annually.
- Reinforce the importance of online safety through regular discussion with young people we support and their parents/carers.
- Provide a safe space for young people who are LGBTQ+ to speak out and share their concerns.
- Be aware of all policies and procedure documents.
- Be aware of the early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems and sharing information with other professionals to support early identification and assessment.
- Be aware of what to do if they identify a safeguarding issue.
- Be aware of how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- Be aware of the different types of abuse and neglect, as well as child specific safeguarding issues such as child-on-child abuse, child sexual exploitation, child criminal exploitation, indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- The importance of reassuring victims that they are being taken seriously and they will be supported and kept safe.
- Be aware of the fact that children can be at risk of harm inside and outside of their home, at school and online.
- Be aware that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children.

All staff and volunteers

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone at The Create Approach Ltd, who comes into contact with children and their families have a role to play in safeguarding children. All staff at The Create Approach Ltd will consider, at all times, what is in the best interests of children.

All staff within our The Create Approach Ltd are particularly important as they are in a position to identify concerns early, provide help to children to prevent concerns from escalating and provide an environment within which children feel safe and can learn.

All our staff are aware of the early help process and understand their role in this. This includes being able to identify emerging problems to recognise children who may benefit from early help. Staff know in the first instance to discuss their concerns with the Designated Safeguarding Lead and understand they may be required to support other agencies and professionals in assessments for early help.

If learners parents/carers wish to seek support, advice, request a meeting or ask for attendance at another professionals meeting, they will be asked to contact Kelly Sherman directly via email kelly@thecreateapproach.co.uk. All parents/carers and visitors to The Create Approach Ltd will be accompanied at all times by a member of staff.

All staff have a key role to play in identifying concerns and provide early help for children.

To achieve this, they will:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Ensure children know there are adults at the centre who they can approach if they are worried or have concerns.
- Plan opportunities within learning projects for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend regular training to be aware of and alert to the signs of abuse.
- Maintain an attitude of “it could happen here” with regards to safeguarding.
- Record their concerns if they are worried that a child is being abused and report these to the DSL as soon as practical that day. If the DSL is not contactable immediately a Deputy DSL should be informed.
- Be prepared to refer directly to social care, and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the NSCP and take account of guidance issued by the DfE KCSiE 2023.
- Support pupils in line with their child protection plan, child in need plan, LAC Care Plan.
- Treat information with confidentiality but never promising to “keep a secret”.
- Notify the DSL or their Deputy, and the school/Council to which they are on rolls at, of any child on a child protection plan or child in need plan who has unexplained absence.
- Understand early help and be prepared to identify and support children who may benefit from early help.
- Liaise with other agencies that support learners and provide early help.
- Ensure they know who the DSL and Deputy DSLs are and know how to contact them (if additional staff are employed in addition to the founder in the future).
- Have an awareness of the Child Protection Policy, the Behaviour Policy (thought and emotion support policy), the staff Code of Conduct, procedures relating to the safeguarding responses and the role of the DSL.

The Create Approach Ltd team seek to engaging in all learning opportunities available and in partnership with other professionals and agencies.

Senior Leadership/Management Team responsibilities:

- Contribute to inter-agency working in line with HM Working Together to Safeguard Children 2018 (updated December 2020) guidance.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf

- Provide a co-ordinated offer of early help when additional needs of children are identified and work in collaboration with the SENCo's of the school/council for which a learner is on roll.
- Ensure all staff, supply staff and volunteers are alert to the definitions of abuse and indicators, and through access to regular training opportunities and updates. All will be provided with a summary document and asked to sign on first visit to The Create Approach Ltd.
- Ensure staff are alert to the various factors that can increase the need for early help.
- Working with Children's Social Care, support their assessment and planning processes including the school's attendance at conference and core group meetings as appropriate.
- Carry out tasks requested by the local authority such as training of staff and volunteers, safer recruitment and maintaining of a single central register.
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the centre.
- Treat any information shared by staff or learners with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff including low-level concerns are dealt with in accordance with guidance from Department for Education (DfE KCSiE 2023 Part Four 'Allegations made against/Concerns raised in relation teachers/facilitators including supply teachers/facilitators, other staff, volunteers and contractors in Sections One and Two.
- Adherence to KCSiE 2023 paragraphs 171 - 175, 'Children potentially at greater risk of harm and Children who need a social worker due to safeguarding or welfare needs'. The Create Approach Ltd recognises that working with social care and agencies to address safeguarding and child protection concerns is essential and we will collaboratively with them to support in any way that we can.

Teachers and centre lead – Professional Duty

The founder of The Create Approach Ltd, Kelly Sherman, is a qualified teacher.

The Teachers Standards 2012 (updated 13 December 2021) remind us that teachers, newly qualified teachers and headteachers should safeguard children and maintain public trust in the teaching profession as part of our professional duties.

The Children and Social Work Act of 2017, places responsibilities for Designated Teacher to have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England and Wales.

All learners at The Create Approach Ltd will be informed that Kelly Sherman, is their designated safeguarding lead and (when applicable) the deputy safeguarding lead in their absence.

Designated Safeguarding Lead

The designated safeguarding Lead who takes lead responsibility for safeguarding children and child protection at The Create Approach Ltd is Kelly Sherman. Kelly Sherman has received appropriate training and support for this role.

(When applicable when staff are recruited) we will also have a Deputy Safeguarding Lead, who will provide cover for the Senior Designated Safeguarding Lead when they are not available. Our Deputy Safeguarding Lead will receive the same training as our Senior Designated Safeguarding Lead. They will provide additional support to ensure the responsibilities for child protection and safeguarding children are fully embedded within the centre ethos and that specific duties are discharged. They will assist the Senior Designated Safeguarding Lead in managing referrals, attending child protection conferences, reviews, core group meetings and other meetings of a safeguarding and protection nature to support the child/children.

The Create Approach Ltd acknowledges the need for effective and appropriate communication between all members of staff in relation to safeguarding pupils. Our Designated Safeguarding Lead will ensure there is a structured procedure within the centre, which will be followed by all members of the centre community in cases of suspected abuse.

Should children be subject of safeguarding concerns the Senior DSL remains responsible for oversight of any child whilst on placement at our alternative education provision.

From September 2022 Ofsted will inspect these arrangements as part of 'the child's journey' and form a judgement regarding the safeguards in place.

The Senior Designated Safeguarding Lead is expected to:

Manage referrals

- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Support staff who make referrals to children's social care and other referral pathways.
- Refer cases where a person is dismissed or left due to risk/harm to a child and the DBS as required.
- Ensure arrangements are in place year-round for all staff and volunteers to seek advice, support and inform of safeguarding concerns, or incidents and disclosures that inform children are at risk of harm, or abuse, harm or bullying or sexual harm or harassment has occurred.

Work with others

- As required, liaise with the 'case manager' (as per Part Four/section one of KCSiE 2023) and the LADO where there are child protection concerns/allegations that relate to a member of staff.
- Liaise with the case manager and the LADO/LADO Allegation Officer where there are concerns about a staff member.
- Liaise with staff on matters of safety and safeguarding and deciding when to make a referral by liaising with other agencies and acts as a source of support, advice, and expertise for other staff.
- Take part in strategy discussions or attend inter-agency meetings and/or support other staff to do so and to contribute to the assessment of children.
- Liaise with the local authority and other agencies in line with HM Working Together to Safeguard Children 2018 (updated December 2020) and local authority procedures and practice guidance.
- The centre lead and designated safeguarding leads are aware of the local arrangements put in place by local authorities for which a child resides and know how to access the NSCP website and training.

Undertake training

- Formal Designated Safeguarding Lead training will be undertaken every two years. Informal training and updating of knowledge and skills will be at regular intervals, undertaken at least annually. The Senior Designated Safeguarding Lead is responsible for their own training and should obtain access to resources or any relevant refresher training.

- The Senior Designated Safeguarding Lead is also responsible for ensuring all other staff with designated safeguarding responsibilities access up to date and timely safeguarding training and maintains a register or data base to evidence the training.

The training undertaken should enable the Designated Safeguarding Lead to:

- Understand the assessment process for providing early help and intervention.
- Have a working knowledge of how the (we refer to)Dorset Pan Safeguarding Children Partnership operates, the conduct of a child protection conference, and be able to attend and contribute to these effectively when required to do so.
- Ensure that each member of staff has access to child protection policy and procedures.
- Be alert to the specific needs of children in need, including those with special educational needs and or disabilities and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Understand the Prevent Duty and provide advice and support to staff on protecting and preventing children from the risk of radicalisation and being grooming into extremist behaviours and attitudes.
- Understand the reporting requirements for FGM.
- Understand and support children to keep safe when online and when they are learning at home.
- Encourage a culture of protecting children, listening to children and their wishes and feelings.

Raise awareness

- Ensure that child protection policies are known, understood, and used appropriately.
- Ensure that the child protection policy is reviewed annually in consultation with staff members, and procedures are updated and reviewed regularly and implemented, and that the governing body is kept up to date and actively involved.
- Work strategically to ensure policies and procedures are up to date and drive and support development work.

- Ensure the child protection policy is available to parents and carers and make parents/carers aware that referrals may be made about suspected abuse or neglect.
- Ensure all staff receive induction training covering child protection **before** working with children and can recognise and report any concerns immediately as they arise.

Child Protection file

- The Senior Designated Safeguarding Lead is responsible for ensuring that when a child leaves the centre their 'child protection', 'child in need' file or 'confidential' file (if applicable) is transferred to the new school/college/alternative provision setting at the same time the child goes on roll of its new school or education provision, or it will be passed back to the school for which the learner is on roll.
- A record of the number of children open and subject to CP, CiN and LAC concerns is maintained and shared with the governing body annually.
- A record or data on the cohort of children having or have had a social worker and social care involvement will be maintained.
- The Create Approach Ltd will maintain, keep and storing records, where a concern about a child has been identified in accordance with statutory guidance.
- Please refer to relevant policies for further information on how all concerns and reports are reported, recorded and responded to in accordance.

Availability

- During term time the Senior Designated Safeguarding Lead (or a Deputy if/when appointed) will always be available face to face / over the phone (during centre hours) for staff to discuss any safeguarding concerns. Appropriate arrangements will also need to be in place all year round for any out of centre hours' activities in line with the guidance contained in DfE KCSiE 2023.

Centre Lead

The centre lead will ensure that:

- The policies and procedures adopted by The Create Approach Ltd (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by **all** staff.

- The Create Approach Ltd maintains an up-to-date Single Central Record (SCR) which is reviewed regularly and is compliant with statutory guidance.
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and inter-agency meetings, and contributing to the assessment of children.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.
- The centre lead will ensure all staff including volunteers have access to and read and understand the requirements placed on them through: - the Child Protection Policy and the Staff Code of Conduct Policy.
- The centre lead will ensure there are mechanisms in place to assist staff to fully understand and discharge their role and responsibilities as set out in KCSiE 2023.
- Where there is an allegation made against a member of staff (either paid or unpaid) that meets the criteria for a referral to the LADO, then the centre lead will discuss the allegation immediately with the LADO (within 24 hours) and ensure that cases are managed as per Part Four: Allegations made against/Concerns raised in relation to teachers/facilitators, other staff, volunteers, and contractors in KCSiE 2023. If the allegation is against the centre lead then a third party will be the local authority appointed to manage an allegation.

Looked After Children – The Role of Designated facilitator and the Designated Safeguarding Lead

A child who has been in the care of their local authority for more than 24 hours is known as a looked after child. Looked after children are also often referred to as children in care, a term which many children and young people prefer. (NSPCC)

- The centre lead has responsibility for promoting the educational achievement of children who are looked after. The Designated facilitator will work with the Virtual School to ensure that the progress of the child is supported.
- The Designated Safeguarding Lead will also have details of the child's social worker and the name of the Assistant Head of the Virtual School. The Designated Safeguarding Lead will work closely with the Designated facilitator (if different), as we recognise that children may have been abused

or neglected before becoming looked after. We will ensure their ongoing safety and wellbeing as well as supporting their education, through linking with their social worker, carers, and parents where appropriate.

- We also recognise those children who were previously Looked-After potentially remain vulnerable and all staff will be informed of the importance of maintaining support for them through our support as an alternative provision. As an alternative provision we will continue to recognise the importance of working with agencies and take prompt actions where necessary to safeguard these children, who may remain vulnerable.



Confidentiality

We recognise that all matters relating to child protection are confidential; however, a member of staff must **never** guarantee confidentiality to children; children will not be given promises that any information about an allegation will not be shared.

Where there is a child protection concern it will be passed immediately to the Designated Safeguarding Lead and/or to children's social care. When a child is in immediate danger children's social care/the police will be contacted. The Local authority and allocated SEND officer will also be notified.

The centre lead or Designated Safeguarding Lead will disclose personal information about a learner to other members of staff, including the level of involvement of other agencies, only on a 'need to know' basis.

All staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children. They are aware that the Data Protection Act 1998 should not be a barrier to sharing of information where failure to do so would result in a child being placed at risk of harm.

Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

If staff need to share special category personal data, the DPA 2018 contains safeguarding of children and individual's at risk as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent it cannot be reasonably expected that a practitioner gains consent or if to gain would place a child at risk.

Parents and carers should normally be informed (unless this would put the victim at greater risk).

The basic safeguarding principle is if a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to local authority children's social care.

We acknowledge further guidance can be found by visiting Pan-Dorset Safeguarding Children Partnership website. <https://pdscp.co.uk/>

Information Sharing

Effective sharing of information between practitioners and local organisations and agencies is essential for early identification of need, assessment, and service provision to keep children safe. Serious Case Reviews (SCRs) now known as Rapid Reviews (RRs) have highlighted that missed opportunities to record and thereby understand the significance of sharing information in a timely manner can have severe consequences for the safety and welfare and well-being of children (Working Together to Safeguard Children 2018, updated December 2020).

We will adopt the information sharing principles detailed in statutory safeguarding guidance contained within:

- DfE KCSiE 2023 has several sections which provide clarity on information sharing processes and GDPR including within Annex C which makes clear the powers to hold and use information when promoting children's welfare.
- HM Working Together to Safeguard Children 2018 Paragraph 23 to 27 and on pages 20 and 21.
- HM Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents, and carers (which has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018).
- Pan Dorset Safeguarding Children Partnership (NSCP) Policy and Practice Guidance - https://pandorsetscb.proceduresonline.com/p_sg_prac_rev.html?zoom_highlight=Child+Safeguarding+Practice+Review+processes
- Child death review processes - https://pandorsetscb.proceduresonline.com/p_cdop.html?zoom_highlight=death

Records and Monitoring

(KCSiE 2022 paragraphs 68 to 70, Part Four, Part Five, Annex C)

Any concerns about a child will be recorded in writing within 24 hours. All records will provide a factual and evidence-based account and there will be accurate recording of any actions. Records will be signed, dated and, where appropriate, witnessed. Where an opinion or professional judgement is recorded this should be clearly stated as such.

At no time should an individual facilitator/member of staff **be asked to or consider** taking photographic evidence of any injuries or marks to a child's person; **this type of behaviour could lead to the staff member being taken into managing allegations procedures**. The body maps should be used in accordance with recording guidance and to support clarity for example of areas of injury, marks and bruising and or touching.

Any concerns should be reported and recorded without delay to the appropriate safeguarding services e.g., MASH or the child's social worker if already an open case to social care.

A chronology will be kept in the learners main file prior to the commencement of a concern file. Staff will record any minor concerns on the chronology and will take responsibility for alerting the Designated Safeguarding Lead should the number of concerns rise or, in their professional judgement, become significant. At the point at which a concern file (see below) is commenced then the chronology can be transferred to the concern file.

Safeguarding, child protection and welfare concerns will be recorded and kept in a separate secure file known as a 'concern' file (formerly referred to as a child protection file), which will be securely stored and away from the main pupil file. The main pupil file should have a **red C** in the top right-hand corner to denote a separate file exists.

The Create Approach Ltd will ensure all our files will be available for external scrutiny for example by a regulatory agency or because of a serious case review or audit.

Why recording is important

Our staff will be encouraged to understand why it is important that recording is comprehensive and accurate and what the messages from serious case reviews are in terms of recording and sharing information. It is often when a chronology of information is pieced together that the level of concern escalates or the whole or wider picture becomes known.

The Create Approach Ltd maintains paper and electronic 'concern's files.

We acknowledge without information being recorded it can be lost. This could be crucial information, the importance of which is not always necessarily apparent at the time. On occasions, this information could be crucial evidence to safeguard a child or be evidence in future criminal prosecutions.

The Child Protection (CP), Child in Need (CiN) or Confidential file

The establishment of a Child Protection, CiN or Confidential Safeguarding file, which is separate from the learner's main educational file, is an important principle in terms of storing and collating information about children which relates to either a child protection or safeguarding concern or an accumulation of concerns about a child's welfare which are outside of the usual range of concerns which relate to ordinary life events.

It should be borne in mind that what constitutes a 'concern' for one child may not be a 'concern' for another and the child's particular circumstances will need to be considered for example if a child is subject to a child protection plan, CiN plan or has looked after status (LAC). Professional judgement will therefore be an important factor when making this decision and will need clear links between pastoral staff and those with Designated Safeguarding Lead responsibilities in school.

A 'child protection' or 'confidential' file should be commenced in the event of:

- A referral to MASH/Children's Social Care.
- A number of minor concerns on the child's main school/centre file.
- Any child open to social care.

All 'child protection' or 'confidential' file should contain the following:

- A front sheet.
- A chronology.
- A record of concern in more detail and body map, where appropriate.
- A record of concerns and issues shared by others.

The Create Approach Ltd will keep written paper and electronic records of concerns about children even where there is no need to refer the matter to MASH/Children's Social Care (or similar) immediately, but these records will be kept within the separate concerns file.

Records will be kept up to date and reviewed regularly by the Snr Designated Safeguarding Lead, to evidence and support actions taken by staff in discharging their safeguarding arrangements. Original notes will be retained (but clearly identified as such) as this is a contemporaneous account; they may be important in any criminal proceedings arising from current or historical allegations of abuse or neglect.

The 'confidential' file can be active or non-active in terms of monitoring i.e., a child is no longer LAC, subject to a child protection plan or EHAF and this level of activity can be recorded on the front sheet as a start and end date. If future concerns arise, they can be re-activated and indicated as such on the front sheet and on the chronology as new information arises.

Transfer of child's child protection file, child in need, LAC, or confidential file (statutory requirement):

The Create Approach Ltd will adopt the file transfer guidance contained in KCSiE 2023 and ensure when a child moves school/education provision their child protection/confidential file is sent securely to their new educational setting when the child starts/ leaves. These files will be password protected.

For those children subject of social care and safeguarding agency involvement will ensure the file is able to evidence the child's journey and include key information as described in KCSiE 2023 Should a child subject to social care involvement transfer schools, college, or education provider we will ensure the child's child protection or confidential file move is transferred within 5 days as required by KCSiE 2023 paragraph 122 pg 32, pg 165.

Our Senior DSLs will liaise directly with the receiving school, college or alternative placement and hold a discussion to share important information to support the child's transfer to ensure the child remains safeguarded, has any 'reasonable adjustments' agreed, and put in place and to ensure the changes experienced by the child are as smooth as possible to enable a positive integration experience and engagement with new staff and learning.

In accordance with KCSiE 2023 we will maintain information on children who have been open to social care, have had a social worker or who are closed to social care and may have returned to the family home. This information will only be considered for sharing 'if appropriate' with the provision in advance of the child leaving to allow for the new provision to continue supporting the children who have had a social worker or been victims of abuse, including those who are currently receiving support through the 'Channel' programme.

The Create Approach Ltd is an alternative provision that supports the reintegration of young people back into mainstream educational provision, either from their original school or to transition into an alternative placement. The main safeguarding priorities remain with the school for which the young person is on roll, however The Create Approach Ltd will support and collaborate in all instances and maintain professional standards and procedures as if it were a mainstream provision.

Recording Practice

- Timely and accurate recording will take place when there are any issues regarding a child.
- A recording of each and every incident or concern for the child will be made, including any telephone calls to other professionals. These will also be recorded on the chronology and kept within the child protection file for that child, as over time they are likely to help identify any patterns or emerging risks and needs. This will include any contact from other agencies who may wish to discuss concerns relating to a child. Actions will be agreed, and roles and responsibility of each agency will be clarified, and outcomes recorded.
- The chronology will be brief and log activity; the full recording will be on the record of concern.

There are templates attached within the appendices, which include a case record, chronology sheet, record of concern disclosure sheet and body maps and guidance.

Further detailed recording will be added to the record of concern and will be signed and dated. Records will include an analysis of the event or concerns and will take account of the holistic needs of the child, and any historical information held on the child's file.

Support and advice will be sought from social care, or early help whenever necessary. In this way a picture can emerge, and this will assist in promoting an evidence-based assessment and determining any action(s) that needs to be taken.

This may include no further action, whether an EHAF should be undertaken, or whether a referral should be made to MASH/Children's Social Care or in accordance with Pan Dorset safeguarding children guidance.

Such robust practice across child protection and in safeguarding and promoting the welfare of children will assist the centre and DSL team in the early identification of any concerns which may require addressing further and the prevention of future harm, risk, or abuse.

The Designated Safeguarding Lead will have a systematic means of monitoring children known or thought to be at risk of harm (through the concern file and through an ongoing dialogue with pastoral staff). They will ensure that we contribute to assessments of need and support multi-agency plans for those children.

Confidentiality and Information Sharing:

The Create Approach Ltd expects all employees, volunteers and trustees to maintain confidentiality. Information will only be shared in line with the General Data Protection Regulations (GDPR) and Data Protection.

However, information should be shared with the Local Authority if a child is deemed to be at risk of harm or **contact the police if they are in immediate danger, or a crime has been committed.**

We will endeavour to safeguard children and young people by:

- Always acting in their best interests.
- Valuing them, listening to and respecting them.

- Involving them in decisions which affect them.
- Never tolerating bullying, homophobic behaviour, racism, sexism or any other forms of discrimination, including through use of technology.
- Provide opportunities to learn about keeping themselves safe, particularly when using technology.
- Exercising our duties under the Counter-Terrorism and Security Act 2015.
- By ensuring all staff attend 'Prevent' training in respect of radicalisation and extremist behaviour and by assessing the risk of our learners being drawn into terrorism.
- Supporting attendance and taking action if a child is missing their designation sessions regularly. Every session if a child does not attend the school/lead provision from which they were referred will be informed.
- Appointing a senior member of staff as the Designated Safeguarding Lead (DSL) and ensuring this person has the time, funding, training, resources and support to perform the role effectively.
- Appointing at least one Deputy Designated Safeguarding Lead to ensure there is always someone available during working hours for staff to discuss any safeguarding concerns.
- Appointing a Designated Person to promote the educational achievement of children who are Looked-After (in care), ensuring that staff working with Looked-After Children have information appropriate to their role regarding, for example, the child's care arrangements, legal status and contact with birth parents and will also have the responsibility for promoting the educational achievement of children who have left care where appropriate.
- Making sure all staff and volunteers are aware of and committed to the safeguarding policy and child protection procedures and also understand their individual responsibility to take action.
- Ensuring that all those named as responsibility for safeguarding, have training appropriate to their roles as set out in statutory guidance.
- Identifying any concerns early and providing appropriate help to prevent them from escalating, including working with parents/carers/guardians and other agencies as appropriate sharing information about child safeguarding concerns with agencies who need to know, and involving children and their parents/carers appropriately.
- Acknowledging and actively promoting that multi-agency working is the best way to promote the welfare of children and protect them from harm.
- Keeping clear, accurate and contemporaneous safeguarding and child protection records.
- Recruiting staff and volunteers safely, ensuring all necessary checks are made in accordance with statutory guidance and legal requirements and also making sure that relevant staff member has undertaken safer recruitment training.
- Providing effective management for staff through induction, support and regular update training appropriate to role.
- Adopting a code of conduct for all staff and volunteers which includes acceptable use of technologies, staff/learner relationships and communications including the use of social media.
- Ensuring our online safety process includes appropriate filters and monitoring systems.
- Ensuring staff and volunteers understand about 'whistle blowing'.
- Ensuring staff know how to escalate concerns about learners or staff if they think the right action has not been taken to safeguard children.
- Promoting a culture in which staff feel able to report what they consider to be unacceptable behaviour or breaches of the centre Code of Conduct by their colleagues, having faith that they will be listened to and appropriate action taken.

- Dealing appropriately with any allegations/concerns about the behaviour of staff or volunteers in accordance with the process set out in statutory guidance.

Recording, information collection and Record Keeping:

A written record must be kept about any concern regarding an adult with safeguarding needs. This must include details of the person involved, the nature of the concern and the actions taken, decision made and why they were made.

All records must be signed and dated. All records must be securely and confidentially stored in line with General Data Protection Regulations (GDPR). <https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/data-protection>

To keep children and young people safe and provide appropriate care for them, The Create Approach Ltd requires accurate and up to date information regarding:

- Names and contact details of persons with whom the child/young person normally lives
- Names and contact details of all persons with parental responsibility (if different from above)
- Emergency contact details (if different from above)
- Details of any persons authorised to collect the student from The Create Approach Ltd site
- Any relevant information such as professional reports both educational and medical.
- If the child/young person is or has been subject to a Child in Need, Child Protection or Care Plan.

The DSL (Kelly Sherman) will collate and securely store this Child Protection information. All child protection documents will be stored securely as password protected e-copies Further information can be found below.

If the information is received as a physical document, which is not usually the case, these will be stored in a locked file which is accessible only to DSL (Kelly Sherman). These records will be transferred when a child moves to another educational setting, clearly marked 'Child Protection, Confidential, for attention of Designated Safeguarding Lead'.

Supporting children reluctant to share

We recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. We recognise that children who are abused or who witness violence may find it difficult to develop a positive sense of self-worth. They may feel helplessness, humiliation, and some sense of blame.

The centre may be the only stable, secure, and predictable element in the lives of children at risk. When at the centre their behaviour may be challenging and defiant or they may be withdrawn. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication. We also recognise that there are children who are more vulnerable than others, which include children with special educational needs and or disabilities.

All staff including volunteers are advised to maintain the attitude of '**it could happen here**' where safeguarding is a concern, and when concerned about the welfare of the child should always act in the **best** interests of the child.

The Create Approach Ltd will endeavour to support the learner through:

- Maintaining an ethos which promotes a positive, supportive, and secure environment, and which gives learners a sense of them being valued (please refer to our thought and emotion support policy).
- The behaviour (thought and emotion) policy, anti-bullying policy and child-on-child abuse policy which is kept up to date with national and local guidance and which is aimed at supporting vulnerable pupils attending The Create Approach Ltd.
- We will proactively ensure that all learners know that some behaviours are unacceptable and will need to be addressed but as members of our community they are valued and will be supported through the time required to deal with any abuse or harm that has occurred, or outcomes from incidents.
- Liaison with other agencies that support the pupil such as Children's Social Care), Behaviour and Attendance Service and Education Psychology Service, use of Complex Case Resolution Meetings and the Early Help Assessment Form (EHAF), etc.
- Ensuring that, where a learner leaves and is subject to a child protection plan, child in need plan or where there have been wider safeguarding concerns, their information is transferred to the new education provision immediately or within **5 working days** and that the child's social worker is informed.
- Where a child discloses a concern or informs of an incident that has involved them in an incident involving sexual violence and or sexual harassment the staff member will ensure the child (victim) is taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence, or sexual harassment.

Recognising abuse and taking action

Safeguarding can involve a range of potential issues such as:

- Neglect, physical abuse, sexual abuse, and emotional abuse.
 - Contextualised also known as extra-familial abuse.
 - Bullying, including online bullying (by text message, on social networking sites, and prejudice-based bullying).
 - Going frequently missing/ going missing from care or home.
 - Domestic Abuse including teenage relationship abuse.
 - Racist, disability- based, homophobic, bi-phobic, or transphobic abuse.
 - Gender based violence/violence against women and girls.
 - Risk of extremist behaviour and/or radicalisation.
 - Child sexual exploitation, human trafficking, modern slavery, sexual or criminal exploitation.
 - A young carer.
 - Has a mental health need.
 - Has special educational needs (whether or not they have a statutory Education Health and Care Plan).
 - Privately fostered.
 - Has returned home to their family from care.
 - Has a family member in prison or is affected by parental offending.
 - Child-on-Child Abuse (This was broadened by KCSiE 2022 to include children abusing other children, other varying form of bullying including online and sexually harmful behaviour, sexual violence, and sexual harassment (further defined in KCSiE 2023 Part Five).
 - Harm outside the home extra familial harm.
 - The impact of new technologies, including 'sexting' and accessing pornography.
-
- Issues which may be specific to a local area or population, is showing signs of being drawn into anti-social or criminal behaviour, including gang activity or involvement and associations with organised crime groups or county lines.
 - In possession of a knife and or involved in knife crime, youth violence, criminal child exploitation (CCE).
 - Is in family circumstances which present challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse/harm.
 - Is at risk of or from serious violence and violent crime.
 - Persistent absence from education, including persistent absence for part of the school day.
 - Particular issues affecting children including domestic abuse and violence, female genital mutilation and honour-based abuse and forced marriage.
 - 'Upskirting'- The Voyeurism (Offences) Act, which is commonly known as Up-skirting Act, came into force on 12 April 2019. Upskirting is a criminal offence and reportable by all.

All our staff and volunteers are aware of, will be trained and briefed in the indicators of abuse and neglect and knowing what to look for is vital for the early identification so that support can be put in place. Our

staff and volunteers are also aware of the specific safeguarding issues that indicate or inform of concerns or incidents linked to child criminal exploitation and child sexual exploitation and know to report concerns directly to the designated safeguarding or a member of the senior leadership team from which the young person is on roll at, should the designated safeguarding lead not be available for children who may be in need of help or protection.

Our staff recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may also feel embarrassed, humiliated, or could be being threatened not to tell, so not feel able to share what is happening to them. Alternatively, we recognise children may not want to make a disclosure or talk about what is happening due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL, Kelly Sherman, if they have concerns about a child and agree a way forward to support the child and determine how best to build trusted relationships with children and young people which facilitate good opportunities for communication.

All staff should **always** speak to the designated safeguarding lead, or deputy at the earliest opportunity.

As an educational provision we are aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore all staff should always be vigilant and always raise any concerns with the designated safeguarding lead (or deputy).

All staff of The Create Approach Ltd should be aware that safeguarding incidents and/or behaviours can be associated with factors outside school/college/alternative provision and/or can occur between children outside of our the centre/learning environment.

All our staff have received information and training regarding the risks that can take place outside their families. This is known as extra-familial harm and these can take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

Our staff are aware that technology offers many opportunities but is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic (strongly prejudice against women) messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content

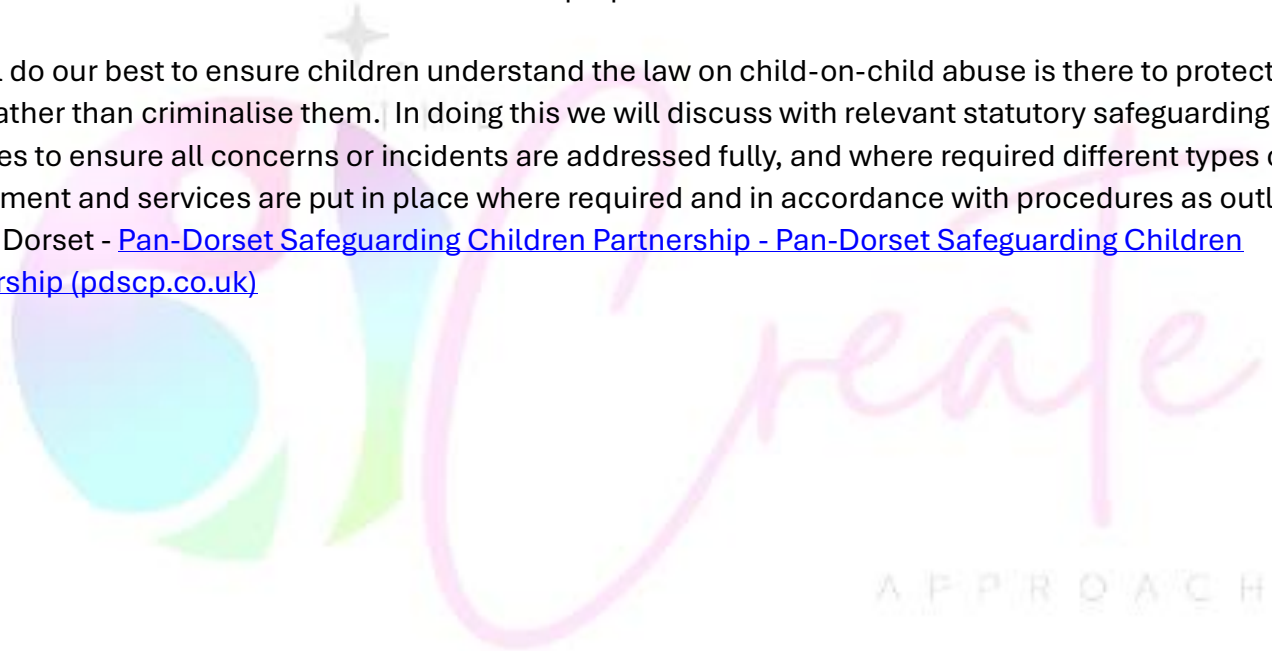
Kelly Sherman, the founder of The Create Approach Ltd, DSL, will always act in the 'best interest of the child' and remain mindful of the importance with parents and carers about safeguarding concerns held for children and in particular children's access to online sites when away from The Create Approach Ltd centre.

We will support understanding of harmful online challenges and hoaxes and share information with parents and carers and where they can get help and support when we become aware. We will share as much information as possible about useful support on our website.

All forms of abuse or harassment will be reported in accordance with national safeguarding guidance, and we will take a 'zero tolerance' approach to harassment and abuse as informed in KCSiE.

Should an incident or disclosure be made by a child attending The Create Approach Ltd, our staff will always reassure the child (victim) that they are being taken seriously and that they will be supported and kept safe, but we recognise that not every victim will view themselves as such. We will also be mindful of the use of other terminology such as '**alleged perpetrator(s)**' or '**perpetrator(s)**' as in some cases the abusive behaviour will have been harmful to the perpetrator as well.

We will do our best to ensure children understand the law on child-on-child abuse is there to protect them rather than criminalise them. In doing this we will discuss with relevant statutory safeguarding agencies to ensure all concerns or incidents are addressed fully, and where required different types of assessment and services are put in place where required and in accordance with procedures as outlined by Pan Dorset - [Pan-Dorset Safeguarding Children Partnership - Pan-Dorset Safeguarding Children Partnership \(pdscp.co.uk\)](https://www.pdscp.co.uk)



Indicators of abuse and neglect and what to look out for:

All members of staff, volunteers and governors will be provided with training to help identify learners who may be being harmed and then how to respond to a pupil who discloses abuse, or where others raise concerns about them. Our staff will be familiar with procedures to be followed.

Staff understand that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition, and that in most cases multiple issues will overlap with each other. Staff who regularly come into contact with children are aware of the DfE guidance [What to do if you're worried a child is being abused](#)

All employees will have to undertake Level 2 safeguarding training as mandatory. They will also be encouraged to undertake level 3 safeguarding training. If employees are to hold a management position, level 3 training will be mandatory.

With reference from KCSiE 2023 Mental Health paragraphs 45 to 47, 165, 171, 180-186, Annex B are to referenced to support the following:

The four categories of child abuse are as follows (several of these definitions have been covered previously in this policy):

1. Physical Abuse
2. Emotional Abuse
3. Sexual Abuse
4. Neglect

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

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectation being imposed on children. These may include interactions that are beyond a child's developmental capability as well as over protection 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 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 masturbations, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children to look 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 is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and **all** staff should be aware of it and 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 (the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding issues: All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk.

Sharing of nudes and semi-nudes ("sexting")

If staff are made aware of an incident involving the consensual or nonconsensual sharing of nude or semi-nude images/ videos (also known as Sexting or youth produced sexual imagery) they must report it to the DSL immediately.

Staff must **not:**

- View, copy, print, share, store, or save the imagery themselves or ask people to share or download it. If staff have already viewed the image by accident they must report it to the DSL.
- Delete the imagery or ask the young person to delete it.
- Ask the young person involved in the incident to disclose information regarding the image (this is the duty of the DSL).
- Share information about the incident with other members of staff, the young people involved or their, other parents/carers.
- Say or do anything to blame or shame the young person involved.
- Explain to the young person that you need to report the incident and reassure the young person they will receive support and help from the DSL.

Initial review meeting

Following an incident report the DSL will hold an initial review meeting with appropriate staff, this may include the staff member who reported the incident and the safeguarding team that deals with

safeguarding concerns. This meeting will consider the initial evidence and aim to determine the following:

- Whether there is an immediate risk to the young person.
- if a referral needs to be made to the police and or children's social care.
- if it is necessary to view the image or images in order to safeguard the young person. In most cases images or videos should not be viewed.
- What further information is required to decide on the best response.
- Whether the image or images have been shared widely and via what services and all platforms. This might not be known.
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the young people involved which would influence risk assessment.
- If there is a need to contact another school, college, education setting or individual.
- Whether to contact parents or carers of the young people involved - in most cases parents and carers should be involved unless this would pose a further risk to the child.

The DSL will make an immediate referral to police and or children social care if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced blackmailed or groomed or if there are concerns about their capacity to consent - for example owing to SEND.
- What the DSL knows about these images or videos suggests the content depicts sexual acts which are unusual for the young persons development stage or are violent.
- The imagery involves sexual acts and any young person in the images or videos under 13.
- The DSL has reason to believe a young person is at immediate risk of harm owing to the sharing of nudes and semi nudes - for example the young person is presenting as suicidal or self harming.

If none of the above apply then the DSL in consultation with the local authority/SEND case officer may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out.

Further review by the DSL

if at the initial review stage a decision has not been made to refer to the police and/ or children social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will not hold interviews with young people involved if appropriate.

If any point in the process there is a concern that a child has been harmed or is at risk of harm they referral will be made to children's social care and/or the police immediately.

Informing parents and carers

the DSL will inform parents/carers I will keep them involved in the process unless there is a good reason to believe that involving them will put the young person at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police this will be done through the normal channels eg by ringing 101.

Reporting incidents

All instances of sharing of nudes and semi nudes and the decisions made in responding to them will be recorded. The record keeping arrangements detailed in this policy will also apply to recording these instances.

Extremism: All staff will have training in preventing radicalisation and extremism ('Prevent') course 1 (awareness) and 2 (referrals) as provided through the Government website: <https://www.support-people-vulnerable-to-radicalisation.service.gov.uk/portal#referrals-course>.

In addition, all staff members will receive regular safeguarding and child protection updates from the DSL as required, but at least annually. This will include learning from local and national serious cases when the learning becomes available.

The Create Approach Ltd ethos demonstrates that the effective safeguarding of children can only be achieved by putting children at the centre of a system where we listen and hear what they say. Every individual within The Create Approach Ltd will play their part, including working with professionals from other agencies, particularly social workers, to meet the needs of our most vulnerable children and keep them safe. We will take opportunities to teach children about important safeguarding issues in a way that is age appropriate.

For additional information on how we ensure a positive approach to ensure a young person is listened to, please refer to our thought and emotional support policy.

The Create Approach Ltd was founded by Kelly Sherman, an ex-teacher whose aim is to provide a safe environment and vigilant culture where children and young people can learn, be supported emotionally and be safeguarded. If there are safeguarding concerns, we will respond with appropriate action in a timely manner for those children who may need help or who may be suffering, or likely to suffer, significant harm.

Where staff members have concerns about a child (as opposed to a child being in immediate danger) they will decide what action to take in conjunction with Kelly Sherman, DSL. Although we advocate that any staff member can make a referral to children's social care or MASH, especially where a child is identified as being in immediate danger, they should however ensure that Kelly Sherman, DSL, is informed as soon as possible.

We also ensure that all our staff are clear that whilst they should discuss and agree with the DSL any actions to be taken, they are able to escalate their concerns and contact MASH, MASH Consultation Line or social care to seek support for the child if despite the discussion with the DSL their concerns remain. Staff are also provided with a copy of The Create Approach Ltd whistle blowing policy and the contact details for the Local Authority LADO and NSPCC helpline.

As The Create Approach Ltd is an alternative provision provider, we will work in collaboration with and support the school/Local authority who continues to be responsible for the safeguarding of the learner.

As an alternative education provision, young people who attend The Create Approach Ltd may have complex needs. It is important that we are made aware by the main educational provision of any additional risks of harm that learners may be vulnerable to. Information sharing for learners attending our centre is vital to support the learner and ensure the learning environment where they are placed has all necessary information for the learner before they access the provision. The working together principles are key to keep the child safe and understanding the vulnerabilities needing to be supported. This should include up to date contact details for the professionals working with the child and family.

KCSiE 2023 (203 – 205) acknowledges that Children who are LGBT may be targeted and informs Homophobia, biphobia, and transphobia are not phobias, they are not fears; they are forms of discrimination of or hate towards LGBT people or those perceived to be LGBT and must not be tolerated. Please refer to our policy for LGBT policy for additional details of support.

Missing children: The Create Approach Ltd is an online SEMH and learning support provision for which the parent remains and is responsible for the young person at all times. No physical responsibility for a child is provided by The Create Approach Ltd.

A variation of this policy is that if young people do not attend a booked session parents will be contacted in the first instance via phone. If no contact is made a voicemail message will be left and an email sent. If no response is received within 1 hour then a further phone call will be made and a further call left. A chase email will be sent to the parent asking if everything is okay. The SEND officer for the young person will also be called and an email sent informing of non-attendance. If a young person is also on roll at school, the contact for the school will be called and an email sent informing of absence.

Further guidance can be found here: <https://pdscp.co.uk/working-with-children/missing-children/>

A child missing from education particularly repeatedly can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation of child criminal exploitation or issues such as mental health problems, substance abuse, radicalization, FGM or forced marriages.

There are many circumstances where a child may be missing from education or be absent but some children are particularly at risk. These include children who:

- Are at risk of harm on neglect
- Are at risk of forced marriage or FGM
- Come from gypsy Roma or traveller families
- Come from the families of service personnel.
- Go missing or run away from home or care.
- Are supervised by the youth justice system.
- Cease to attend a school.
- Come from new migrant families.

As outlined above we will work with other agencies to help identify unauthorised and repeated absence to help identify the risk of abuse and neglect, including sexual exploitation and to help prevent the risks of going missing in the future.

Training and discussions will be put in place to look out for the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may relate to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect we will follow the local child protection procedures including with respect to making reasonable inquiries As outlined in a previous paragraph. We will make an immediate referral to the local authority children's social care team and the police if the child is suffering or likely to suffer from harm or in immediate danger.

Child criminal exploitation: Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (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.

The Create Approach Ltd are aware that the criminal exploitation of children is a geographically widespread form of harm which:

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

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Guidance about criminal exploitation of children is available in Criminal Exploitation of Children and Vulnerable Adults <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines> . This guidance outlines what signs to look for in potential victims, and what to do about it. The document is a supplement to existing safeguarding policies, to help identify and protect those exploited through this criminal activity.

If a staff member develops concerns that a pupil is being drawn into criminal exploitation, this should be reported to the DSL (Kelly Sherman or Kelly Sherman as DSL will report) or in their absence the DDSL who will, where appropriate, make referrals through the National Referral Mechanism in the UK, or an equivalent mechanism overseas - <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>

Child sexual exploitation: Please also refer to references about sharing of nudes and semi-nudes.

Child sexual exploitation (CSE) is a form of sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage of increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

A significant number of children who are victims of exploitation go missing from home, care and education at some point. Some of the following signs may be indicators:

- Children who have unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who have older girlfriends or boyfriends.
- Children who suffer from sexually transmitted infections.
- Children who suffer from changes in emotional wellbeing.
- Children who misuse drugs or alcohol.
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss school or education or do not take part in education.

Child sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. If future staff are recruited by The Create Approach Ltd training will be provided on this and discussions for awareness held. Any concerns should be reported immediately to the DSL, Kelly Sherman (if future staff employed) or in their absence the DDSL (if future staff employed).

Child on child abuse: Please also refer to our stand alone policy on this.

Child-on-child abuse (originally termed as peer on peer abused) is when children abuse other children. This type of abuse can take place inside and outside of educational establishments. It can also take place both face-to-face and online and can occur simultaneously between the 2.

The Create Approach Ltd only offers 1:1 support with a parent present at all times. If The Create Approach were in the future to operate facilitating groups it would have a zero-tolerance approach to sexual violence and sexual harassment, this is still upheld in 1:1 sessions. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

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

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures of reporting safeguarding concerns, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Bullying: Please refer to the stand alone policy for The Create Approach Ltd titled Anti bullying policy.

Domestic abuse: Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in an educational establishment/local authority (usually the designated safeguarding lead) before the child or children arrive at their place of learning the following day. This is the procedure where police forces are part of Operation Encompass -

<https://www.operationencompass.org/>

The DSL will provide support according to the child's needs and update records about their circumstances.

Gang involvement and criminal activity: Staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime, either through participation in or as victims of gang violence. These may include:

- Becoming withdrawn from family;
- A change in friendships or relationships with older individuals or groups;
- A sudden loss of interest in school – decline in attendance or academic achievement;
- Using new or unknown slang words;
- Holding unexplained money or possessions;
- Staying out unusually late without reason;
- A sudden change in appearance, including dressing in a particular style or 'uniform';
- A new nickname;
- Signs of assault or unexplained injuries;
- Increased use of social networking sites;

- Starting to adopt codes of group behaviour e.g. ways of talking and hand signs;
- Expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past;
- Expressing fear about entering certain areas or being concerned by the presence of unknown youths in their neighbourhood.

The Create Approach Ltd only is operated by one person. If in the future staff are employed the following will apply - staff need to be able to identify the signs and indicators of these and share their concerns immediately with the DSL, or in their absence the DDSL. The DSL/DDSL will normally consult the child's parents. If the child is based in the UK, the DSL/DDSL will contact the Local Authority's Children's Social Care Service or police for the area in which the child is currently located.

Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The Create Approach Ltd only is operated by one person. If in the future staff are employed the following will apply - the DSL and Deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Honour based abuse (HBA) (including FGM and forced marriage): So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. The Create Approach Ltd only is operated by one person. If in the future staff are employed the following will apply - If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Looked after children and private fostering: A looked-after child is a child who is looked after by a local authority, subject to a care order or who is voluntarily accommodated by a local authority, commonly as a result of abuse or neglect. All staff should understand how to keep a looked-after child safe. When a staff member is given responsibility for a looked-after child, they will be provided with the information they need in relation to the child's legal status, care arrangements and the level of authority delegated to the cases by the local authority looking after him. The DSL takes the lead on all looked-after children and will hold details of and liaise with the child's social worker.

Private fostering is when a parent makes arrangements for their child (who is under 16, or under 18 if they are disabled) to live with someone who isn't an aunt/uncle, grandparent, brother/sister or stepparent, for longer than 28 days. The person who has been asked to look after the child is known as a private foster carer. The Create Approach Ltd has a legal duty to tell the relevant Local Authority if it becomes aware of any private fostering arrangement in the UK or if it suspects that a child is subject to a private fostering arrangement in the UK. The Local Authority is then able to check that the child is safe and being well looked after and that the accommodation and care being given is satisfactory.

FGM: The DSL will make sure staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Further details are set out in this policy regarding FGM. Policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a young person is at risk of FGM.

Indicators that FGM has already occurred include:

- A young person confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE (PE is not applicable at The Create Approach Ltd)
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from an adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to consider the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage: Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a young person is being forced into marriage, they will speak to the young person about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the young person about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fco.gov.uk

Sexual violence and sexual harassment between children: Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children

- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same place of education/support.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures for reporting as appropriate.

Serious violence: Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from place of education/support
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing

- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation)

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a young person being involved in, or at risk of, serious violence, they will report this to the DSL.

Abuse through digital media: Please also refer to information regarding the reporting of nudes and semi-nudes (sexting). The following guidance has been taken from Pan Dorset website. Please also refer to our other policies such as anti-bullying and social media policy.

Internet Abuse' relates to four primary areas of abuse to children:

- Sharing and production of abusive images of children (although these are not confined to the internet);
- A child or young person being groomed online for the purpose of Sexual Abuse;
- Exposure to pornographic images and other offensive material via the internet; and
- The use of the internet, and in particular social media sites, to engage children in extremist ideologies or to promote gang related violence.

The term digital (data carrying signals carrying electronic or optical pulses) and interactive (a message relates to other previous message/s and the relationship between them) technology covers a range of electronic tools. These are constantly being upgraded and their use has become more widespread as the Internet can be accessed easily on mobile / smart phones, laptops, computers, tablets and games consoles.

Social networking sites are often used by perpetrators as an easy way to access children and young people for sexual abuse. In addition, radical and extremist groups may use social networking to attract children and young people into rigid and narrow ideologies that are intolerant of diversity: this is similar to the grooming process and exploits the same vulnerabilities.

Internet abuse may also include cyber-bullying or online bullying. This is when a child is tormented, threatened, harassed, humiliated, embarrassed or otherwise targeted by another child using the internet and/or mobile devices. In the case of online bullying it is possible for one victim to be bullied by many perpetrators. In any case of severe bullying it may be appropriate to consider the behaviour as child abuse by another young person.

With effect from 29 June 2021, section 69 Domestic Abuse Act 2021 expanded so-called 'revenge porn' to include threats to disclose private sexual photographs and films with intent to cause distress.

E-safety is the generic term that refers to raising awareness about how children, young people and adults can protect themselves when using digital technology and in the online environment and provides examples of interventions that can reduce the level of risk for children and young people.

Where there is suspected or actual evidence of anyone accessing or creating indecent images of children, this must be shared with the Police and Children's social care in line with Pan Dorset referrals - https://pandorsetscb.proceduresonline.com/p_referrals.html

It is essential that the materials are not forwarded as part of a referral or for the purpose of capturing evidence. In doing so a further offence would be committed. Any device found to have an indecent image / messaging will be seized by Police.

For further detailed information please refer to the up to date guidance on Pan Dorset website - https://pandorsetscb.proceduresonline.com/p_online_abuse_dig_media.html?zoom_highlight=online+safety

Self-harm and suicidal behaviour: This should also be read inline with out thought and emotion support policy.

Any child who expresses thoughts about self-harm, self-harms or expresses thoughts about suicide must be taken seriously and appropriate help and intervention offered at the earliest point. Any practitioner aware should talk to the young person without delay.

Definitions from the Mental Health Foundation (2003) are:

- Deliberate self-harm is self-harm without suicidal intent, resulting in non-fatal injury;
- Attempted suicide is self-harm with intent to take life, resulting in non-fatal injury;
- Suicide is self-harm, resulting in death.

The term self-harm rather than deliberate self-harm is the preferred term as it a more neutral terminology recognising that whilst the act is intentional it is often not within the young person's ability to control it.

Self-harm is a common precursor to suicide and children and young people who deliberately self-harm may kill themselves by accident.

Self-harm can be described as wide range of behaviours that someone does to themselves in a deliberate and usually hidden way. In the vast majority of cases self-harm remains a secretive behaviour that can go on for a long time without being discovered. Many children and young people may struggle to express their feelings in another way and will need a supportive response to assist them to explore their feelings and behaviour and the possible outcomes for them.

The indicators that a child or young person may be at risk of taking actions to harm themselves or attempt suicide can cover a wide range of life events such as bereavement, bullying at school or a variety of forms of cyber bullying, often via mobile phones, homophobic bullying, mental health problems

including eating disorders, family problems such as domestic abuse or any form of child abuse as well as conflict between the child and parents.

The signs of the distress the child may be under can take many forms and can include:

- Cutting behaviours;
- Other forms of self-harm, such as burning, scalding, banging, hair pulling;
- Self-poisoning;
- Not looking after their needs properly emotionally or physically;
- Direct injury such as scratching, cutting, burning, hitting yourself, swallowing or putting things inside;
- Staying in an abusive relationship;
- Taking risks too easily;
- Eating distress (anorexia and bulimia);
- Addiction for example, to alcohol or drugs;
- Low self-esteem and expressions of hopelessness.

A supportive response demonstrating respect and understanding of the child or young person, along with a non-judgmental stance, are of prime importance. Note also that a child or young person who has a learning disability may find it more difficult to express their thoughts.

Practitioners should talk to the child or young person and establish:

- If they have taken any substances or injured themselves, if so, the severity of this and whether medical treatment is needed;
- Find out if there is an immediate concern for the child or young person's safety;
- Find out what is troubling them;
- Explore how imminent or likely self-harm might be;
- Find out what help or support the child or young person would wish to have;
- Find out who else may be aware of their feelings.

Further details to be referred to support can be found here -

https://pandorsetscb.proceduresonline.com/p_self_harm.html

All concerns and details of discussion must be reported to the DSL.

Training and Awareness requirements:

The Create Approach Ltd will ensure an appropriate level of safeguarding training is available to its employees, volunteers and any relevant persons linked to the organisation who requires it (e.g. contractors).

For all employees who are working or volunteering with children, this requires them as a minimum to have awareness training that enables them to:

- Understand what safeguarding is and their role in safeguarding children.
- Recognising a child potentially in need of safeguarding and take action.
- Understand how to report a safeguarding Alert.
- Understand dignity and respect when working with children.
- Have knowledge of the Safeguarding Children Policy.

Similarly, employees and volunteers may encounter concerns about the safety and wellbeing of an adult at risk of abuse.

All employees will have to undertake Level 2 safeguarding training as mandatory. They will also be encouraged to undertake level 3 safeguarding training. If employees are to hold a management position, level 3 training will be mandatory.

Child protection will be part of induction for all staff and regular volunteers new to The Create Approach Ltd. They will be given a copy of this policy, the Code of Conduct, details about the role of the DSL and part one of 'Keeping Children Safe in Education 2023. All staff will be required to complete level 2 and level 3 safeguard training due to the nature of our work and will be asked to refresh their certification every 2 years, or in line with changing requirements.

This will be followed up by basic child protection training that equips individuals to recognise and respond appropriately to concerns about learners.

In addition, all staff members will receive regular safeguarding and child protection updates from the DSL as required, but at least annually. This will include learning from local and national serious cases when the learning becomes available.

In addition, their knowledge and skills will be updated regularly - at least annually. These individuals are expected to take responsibility for their own learning about safeguarding and child protection by, for example: taking time to read and digest newsletters and relevant research articles; attending training offered on matters such as domestic abuse, attachment and child sexual and criminal exploitation; completing on-line training on FGM; attending local DSL forums etc.

The proprietor and any other relevant senior staff will complete safer recruitment training through a provider e.g www.educare.co.uk.

Extremism

All staff will have training in preventing radicalisation and extremism ('Prevent') course 1 (awareness) and 2 (referrals) as provided through the Government website: <https://www.support-people-vulnerable-to-radicalisation.service.gov.uk/portal#referrals-course> and certificates renewed on a yearly basis.

If a child is not suffering or likely to suffer from harm or in immediate danger, where possible, speak to the DSL first to agree on a course of action.

If in exceptional circumstances the DSL is not available, this should not delay action being taken. Speak to a senior member of staff or seek advice from the local authority children's social care. Make a referral to local children's social care directly, if appropriate. Inform the DSL/DDSL as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, which is the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. More information about Channel can be found here:

<https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance/channel-duty-guidance-protecting-people-susceptible-to-radicalisation-accessible#section-1-prevent>

The DfE also has a dedicated telephone helpline, 020 7340 7264, which education staff can call to raise concerns about extremism with respect to a young person they support, you can also e-mail counter@extremism@education.gov.uk note this is not for use in emergency situations.

If an emergency call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist related.
- HM Working Together to Safeguard Children, published 4 July 2018 (updated December 2020).
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- DfE Keeping Children Safe in Education 2022 (KCSiE) in force from 1 September 2023.
https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping_children_safe_in_education_2023.pdf

KCSiE 2023 sets out what schools and colleges should and must do to safeguard children. The substantive changes from KCSiE 2022 are within KCSiE 2023 at Annex F, pages 176 to 177 of the guidance.

DfE Sexual Violence and Sexual Harassment in Schools and Colleges- Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads published July 2021, was included in the main body of KCSiE 2022 and is in section five of KCSiE 2023. Its focus is child on child sexual violence and sexual harassment at schools and colleges and now highlights the importance of ensuring children understand the law on child on child abuse being there to

protect them rather than criminalise them and also includes the importance of understanding intra familial harms and any necessary support for siblings following incidents (see paragraph 482) The advice covers children of **all ages**, from primary through to secondary stage and into colleges and online. **A child is anyone under the age of 18.**

Whilst the focus of the advice is on protecting and supporting children and young people attending The Create Approach Ltd, we will apply to protect any adult learners and engage with adult social care, support services and the police as required.

The advice sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur or is alleged to have occurred. The advice highlights best practice and cross-references other advice, statutory guidance, and the legal framework, including the need for educational provisions to be included as relevant agencies and be part of discussions with statutory safeguarding partners.

It is important that policies and procedures are developed in line with legal obligations, including the Human Rights Act 1998 and the Equality Act 2010, especially the Public Sector Equality Duty, and our local multi-agency safeguarding arrangements. - **Pan-Dorset Multi Agency Safeguarding Procedures** - [Pan-Dorset Multi-Agency Safeguarding Policies and Procedures Manual \(proceduresonline.com\)](https://proceduresonline.com/Pan-Dorset-Multi-Agency-Safeguarding-Policies-and-Procedures-Manual)

The DfE have added clarification to paragraphs regarding the Human Rights Act 1998, the Equality Act 2010, and the Public Sector Equality Duty (see paragraphs 82 to 93) for more detail.

- **What to do if you're Worried a Child is Being Abused (2015)** [What to do if you're worried a child is being abused – advice for practitioners.](#)
- The NSPCC's what you can do to report abuse dedicated helpline is available as an alternative route for facilitators at The Create Approach Ltd who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by The Create Approach Ltd via <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/> or by calling 0800 028 0285- line is available 8.00am to 8.00pm Monday to Friday and email: help@nspcc.org.uk

The guidance in KCSiE 2023 includes changes that have been updated from KCSiE 2022 and is outline on pages 176-177. Updates from KCSiE 2022 have remained in this policy detailed below:

The DSL, Kelly Sherman, should be physically available during normal centre hours – but notes that in exceptional circumstances the availability may be via Teams or mobile phone. Safeguarding concerns outside of term time remain with the main education provision for which learners are on roll with.

The DSL understand the role of the 'Appropriate Adult' within a police investigation - The role of the appropriate adult is to safeguard the interests, rights, entitlements and welfare of children and vulnerable people who are suspected of a criminal offence, by ensuring that they are treated in a fair and just manner, and are able to participate effectively.

The Create Approach Ltd safeguarding procedures acknowledge the term '**victim**', which refers to those who have been subjected to abuse but recognises that not every victim will view themselves as such. It also should acknowledge the term '**alleged perpetrator(s)**' and or where appropriate '**perpetrator(s)**.' Caution in the use of this term should be in place as in some cases the abusive behaviour could have been harmful to the perpetrator as well.

It is recognised that children and young people may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff at The Create Approach Ltd from having a professional curiosity and speaking to the DSL, Kelly Sherman, the founder of The Create Approach Ltd, if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

The Create Approach Ltd acknowledges the term Peer on Peer Abuse has been replaced with Child-on-Child Abuse because abuse by children can happen at any age and the term relates to Sexually harmful Behaviour and other forms of bullying.

Serious Violence – all staff at The Create Approach Ltd will continually train to be aware of the indicators and risk factors. Procedures are reflected in the school's management of safeguarding and linked into the child protection policy. Zero tolerance to incidents of sexual violence and sexual harassment and should be always applied as informed by KCSiE 2023 paragraph 48, Annex B page 152. The DSL will use national and local guidance regarding how to respond to incidences of child-on-child sexual violence and sexual harassment.

KCSiE 2022 broadened the response required by safeguarding agencies and school to address and Harm outside the home extra familial harm, it requires a whole school ethos and sharing of best practice to support children, parent's, carers, and families. Schools are a place of protection and where children can share concerns and seek support. Although The Create Approach Ltd is not a school, we will work closely with schools to support this and make all staff at The Create Approach Ltd aware through continual training.

All staff will be made aware that safeguarding incidents and or behaviours can be associated with factors outside the schools or college and can occur between children outside of these environments. Including Harmful online challenges and hoaxes. We will share with parents and carers knowledge that we are made aware of about children's/young people's access to online sites when away from schools, college or the centre and how to protect and mitigate against harmful behaviours and challenges.

Extra- familial harm takes a variety of different forms and children can be vulnerable to multiple harms including sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

The Create Approach Ltd recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own

intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

We are aware that additional barriers can exist when recognising abuse and neglect for children and young people with SEND. Children and young people with SEND are more prone to peer group isolation or bullying (including prejudice-based bullying) and other safeguarding risks than other children and may not always show outward signs and may have communications barriers and difficulties in reporting challenges.

The Create Approach Ltd will retain a record or data on the cohort of children/young people having or have had a social worker and social care involvement. We are aware that this is important and now includes clarification and greater emphasis on the importance of the DSL, Designated Teacher and SENCO in managing coordinated oversight for children with special educational needs and disability (SEND).

KCSiE 2022 acknowledges that Children who are LGBTQ+ may be targeted. Homophobia, biphobia, and transphobia are not phobias, they are not fears; they are forms of discrimination of or hate towards LGBTQ+ people or those perceived to be LGBTQ+ must not be tolerated.

Although The Create Approach Ltd conducts sessions primarily face to face, we acknowledge and accept our responsibility to safeguard and promote the welfare of children/young people and provide them with a safe environment in which to learn online. Appropriate filters and monitoring systems need to be in place and be regularly reviewed to ensure their effectiveness.

Children and young people have unlimited and unrestricted access to the internet via mobile phone networks (i.e., 3G, 4G and 5G). This access means some, whilst attending educational placements, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

The Create Approach Ltd is aware an additional section has been added to KCSiE 2022 Part Four: The Management of Allegations/Concerns raised in relation to teachers, including supply teachers, other staff, volunteers, and contractors has added information in Section Two to provide clarity on the process for sharing low-level concerns introduced last year in KCSiE 2021, these include concerns that do not meet the harm threshold i.e. low-level concerns, these concerns could transfer into formal complaints and will need to be considered. Staff codes of conduct or staff behaviour policies need to take into account the new requirements set out in Part Four paragraph 43 to 435.

In addition, KCSiE 2022 highlights the importance of the frontline staff in developing The Create Approach Ltd's child protection policy. As part of the review process, we encourage children/young people with which we work to have a say in the development of our policy.

KCSiE 2022 acknowledgement of Human Rights: This year clarification on the application of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the Human Rights Act, it is unlawful for schools, colleges and educational provisions to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right).
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity.
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,²⁵.
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. The Create Approach Ltd takes into account an individual's human rights when developing our policies, procedures and applying decisions.

All staff and volunteers will be briefed and fully aware of our Child protection policy and understand how to carry out the responsibilities it places upon them through receiving regular training.

The Child protection policy along with all related statutory policies are readily available and published on The Create Approach Ltd website to enable parents/carers, safeguarding partners, and the community easy access.

Updates made to KCSIE 2023 included:

- Clarification around the roles and responsibilities of education staff in relation to filtering and monitoring
- Clarification that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation
- Additional information on online pre-recruitment checks for shortlisted candidates
- Information on responding to allegations related to organisations or individuals using school premises.

The Department of Education (DfE) has updated their Keeping Children Safe in Education guidance, which came into force on Friday 1st September 2023.

An overview of the changes and guidance that support you to fulfil safeguarding responsibilities.

Forced marriage

The Marriage and Civil Partnership (Minimum Age) Act 2022, which came into force in February 2023, states that it is a crime to carry out any conduct with the purpose of causing a child to marry before their 18th birthday. Existing forced marriage guidance applies to all kinds of marriages, including non-legally binding marriages.

Discovering that FGM has taken place or a child is at risk of FGM

Keeping children safe in education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”. FGM is illegal in the UK and as a form of child abuse with long lasting harmful consequences. It is also known as female genital cutting, circumcision or initiation.

Possible indicators that a child has already been subjected to FGM and factors that suggest a pupil may be at risk are set out in appendix 4 of this policy.

Any members of staff who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girls physical or mental health or for purposes connected with labour or birth.

Must report this to the DSL who will report to the police immediately. This is a mandatory statutory duty and staff will face disciplinary sanctions for failing to meet it. This applies to children residing in the UK. Social care should also be notified.

Staff are not to examine children.

Children missing and absent from education

Persistently absent children and children missing from education could be an indicator that a child is at risk of harm or that there are safeguarding issues within the family or local community around a child. Government data shows that local authorities reported an estimated 24,700 children missing from education on census day in 2023. This figure is based on 23,100 reported by 92% of local authorities, plus an estimated figure for the missing 8%.

<https://explore-education-statistics.service.gov.uk/find-statistics/children-missing-education>

Children missing in education 2023 If you are worried about a child who is at risk of/who is missing or absent from education, report this immediately to the school's Designated Safeguarding Lead (DSL).

Filtering and monitoring online activity

The latest KCSIE update has a large focus on filtering and monitoring processes within schools. This refers to appropriate checks and safeguards being in place regarding a child's online activity when using

school technology and to ensure that dangerous content is blocked. Equally, there needs to be an IT system in place to identify if a child is searching for harmful content, so that appropriate action can be taken to keep them safe. **No electronic devices are used by learners supported by The Create Approach Ltd as all is virtual mentoring with a parent present.**

Detailed summary of changes within KSCiE 2023:

Part 1: Safeguarding information for all staff Paragraph

13 What staff need to know Updated link to Behaviour in schools guidance - https://assets.publishing.service.gov.uk/media/65ce3721e1bdec001a3221fe/Behaviour_in_schools_-_advice_for_headteachers_and_school_staff_Feb_2024.pdf

Paragraph 14 What staff need to know New text added to raise awareness of the existing expectation for relevant staff to understand filtering and monitoring.

Part 2: The management of safeguarding

Paragraph 124 Staff training New text added to make clear staff training should include understanding roles and responsibilities in relation to filtering and monitoring.

Paragraph 138 Online safety Reference to child protection policies and appropriate filtering and monitoring on school devices and school networks.

Paragraph 142 Filtering and monitoring Added new section referencing the newly published filtering and monitoring standards. The standards are to support schools to meet their duty to have appropriate/effective filtering and monitoring systems in place.

Paragraph 144 Information security Reference to cyber security standards.

Paragraph 167 Use of school or college premises for non-school/ college activities Updated to reference keeping children safe in out-of-school settings.

Paragraph 175 Children who are absent from education Clarification provided on the difference between children missing education and children absent from education.

Paragraph 202 Children with special educational needs, disabilities or health issues Additional signposting to specialist organisations for children with special educational needs and disabilities.

Part 3: Safer recruitment

Footnote 221 Recruitment - shortlisting Clarification that it is good practice for schools to inform shortlisted candidates that online searches will be carried out.

Part 4: Allegations/concerns

New heading and paragraph Organisations or individuals using school premises.

Part five: Child-on-child sexual violence and sexual harassment

Throughout the guidance Revised to reflect wording in behaviour in schools guidance.

Annex A:

Safeguarding information for school and college staff Revised to reflect changes in KCSIE (Part 1).

Annex B:

Children absent from education Revised to reflect the difference between children absent from education and children missing education.

Forced marriage Reflects changes in law from February 2023.

Child exploitation New reference to multi-agency practice principles -

<https://tce.researchinpractice.org.uk/wp-content/uploads/2023/03/FINAL-Multi-agency-Practice-Principles-for-responding-to-child-exploitation-and-extrafamilial-harm-Designed-.pdf>



Safer recruitment

Safer recruitment practices are essential for safeguarding and will be adhered to ensuring appropriate safeguarding checks have been conducted on individuals working at The Create Approach Ltd, i.e., those checks that a school where a learner attend would otherwise perform in respect of its own staff will be carried out for our alternative provision.

Section 11, Children Act 2004, sets out the arrangements for safeguarding and promoting the welfare of children and applies to all key local bodies named under section 11(1) of the Act. One of the key features of these arrangements is ensuring safe recruitment procedures are in place.

The Create Approach Ltd is committed to safe employment and safe recruitment practices, that reduce the risk of harm to children from people unsuitable to work with them or have contact with them.

The Create Approach Ltd has policies and procedures that cover the recruitment of all employees and volunteers. The Create Approach Ltd is committed to receiving, following and engaging in all training that will help us to create robust recruitment and selection procedures to help us identify and deter people who might abuse children or are otherwise unsuitable for employment and to minimise the possibility of children and young people suffering harm from those in a position of trust.

Rigorous recruitment and selection procedures and adhering to the code of conduct and safer practice guidance will hopefully mean that there are relatively few allegations against or concerns about staff or volunteers. However, if a member of staff, or any other person, has any reason to believe that another adult has acted inappropriately or abused a child or young person, they will act by reporting to the proprietor or DSL if this is a different person. Even though it may seem difficult to believe that a colleague may be unsuitable to work with children, the risk is far too serious for any member of staff to dismiss such a suspicion without acting

All staff, volunteers and visitors will receive a summary safeguarding policy to read, sign and keep.

Kelly Sherman, DSL, maintains a key role in raising awareness amongst staff about the needs of children who have or who have had a social worker and the barriers that those children might experience in respect of attendance, engagement and achievement.

As we are working with educational provisions for which the learner is on roll, we will closely with their designated DSL about children who have or who have had a social worker. We request that appropriate information is shared on individual children's circumstances.

As per updated KCSiE 2023 guidance - Footnote 221 Recruitment - shortlisting Clarification that it is good practice for schools to inform shortlisted candidates that online searches will be carried out.

Safe Staff and Safe Recruitment

- The leadership team of The Create Approach Ltd will ensure that all safer working practices and recruitment procedures are followed in accordance with the guidance set out in KCSiE 2023 Part Three and advised by Pan Dorset policy and practice guidance.
- Statutory pre-employment checks and references from previous employers are an essential part of the recruitment process. We will ensure we adopt the appropriate necessary procedures to carry out the checks required and where any concerns arise, we will seek advice and act in accordance with national guidance.
- The Create Approach Ltd has in place recruitment, selection, and vetting procedures in accordance with KCSiE 2023 Part Three and maintains a Single Central Record (SCR), which is reviewed regularly and updated in accordance with KCSiE 2023 Part Three paragraphs 268 to 278.
- Staff will be provided with and explained the employee Code of Conduct, which includes contact between staff and learners outside the work context in line with KCSiE Part Four Section two. Staff will be provided with a copy of this policy, a copy for which their manager and themselves will sign to confirm confirmation this has been explained and an electronic copy along with all other policies.
- Newly appointed staff and volunteers will be informed of our arrangements for safer working practices by Kelly Sherman before beginning working and contact with learners.
- In the event of any complaint or allegation against a member of staff, the centre lead, Kelly Sherman, or the Designated Safeguarding Lead if Kelly Sherman is not present, will be notified immediately. If it relates to the centre lead, the council will be informed without delay. We will respond to all allegations robustly and appropriately in collaboration with the Local Authority Designated Officer (LADO)/ LADO Allegation Officers.
- Staff may find some of the issues relating to child protection and the broader areas of safeguarding upsetting and may need support which will be provided by the centre lead.
- All new employees will be appropriately inducted to their role and provided with electronic as well as paper copies of all policies. An induction checklist will be completed and signed by all parties. KCSiE 2023 Part Three Safer Recruitment will be referred to, to ensure compliance.

KCSiE 2023 Part Three 327-328: Alternative Provision – states where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil. We will work in liaison with the

school for which the learner has been referred and provide written confirmation with proof of training that appropriate safeguarding checks have been conducted on individuals working at the establishment, i.e., those checks that the school would otherwise perform in respect of its own staff.

Links to other policies

This policy should be read alongside and in conjunction with all other available policies and statutory guidance regarding the safety and welfare of children. These together will make up the suite of policies to safeguard and promote the welfare of children attending The Create Approach Ltd.

Safeguarding Training

All our staff are aware of systems within The Create Approach Ltd, and these are explained to them as part of staff induction, which include our child protection policy; the employee code of conduct and the role of the Designated Safeguarding Lead and Keeping Children Safe in Education 2023.

The Create Approach Ltd utilises an induction checklist when staff are inducted which includes the above, but also other policy and procedural information. All staff members are provided with a printed handbook and an electronic copy of policies and procedures.

All our staff receive safeguarding and child protection training which is updated every two years. In addition, to this training all staff members receive child protection and safeguarding updates when required, but at least annually. This training will be provided by both the DSL, Kelly Sherman, and online training courses provided by Dorset Nexus. Staff will also be briefed in weekly meetings about any national and local safeguarding updates. This information will be emailed to them in summary through minutes of meetings and newsletters.

All our staff know what to do if a child is raising concerns or makes a disclosure of abuse and/or neglect. Staff will maintain a level of confidentiality whilst liaising with the Designated Safeguarding Lead and children's social care. Our staff will never promise a child that they will not tell anyone about a disclosure or allegation, recognising this may not be in the best interest of the child.

Allegations against staff and collaboration with LADO

One individual works for The Create Approach Ltd and that is the owner of the company, Kelly Sherman. No one else is employed by The Create Approach Ltd and it is not the intention to employ anyone. No sub-contractors are used by The Create Approach Ltd.

This policy has been written if in the future anyone was employed to work for The Create Approach Ltd.

If a parent/career wishes to make an allegation and register their concern they are requested to contact either the BCP or Dorset LADO – email's and telephone numbers are as below.

The **Pan-Dorset Multi Agency Safeguarding Procedures/BCP Local authority designated officer (LADO)** service should be used when there is an allegation or concern that any person who works with children, in connection with his/her employment or voluntary activity, has:

- Behaved in a way that has harmed, or may have harmed, a child;
- Possibly committed a criminal offence against children, or related to a child;
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The contact number for BCP LADO is 01202 817600. Their email address is LADO@bcpcouncil.gov.uk

The LADO referral form can be accessed here - <https://www.bcpcouncil.gov.uk/documents/children-young-people-and-families/LADO-Referral-Form.pdf>

To contact the Dorset LADO, telephone 01305 221122, or please complete this e-referral form [Referral – Management of Allegations against people who work with children \(Dorset\)](#)

These behaviours should be considered within the context of the four categories of abuse (i.e. physical, sexual and emotional abuse and neglect). These include concerns relating to inappropriate relationships between members of staff and children or young people.

The Create Approach Ltd is not a maintained school, but the founder is an ex teacher and is committed to ensuring that it's education functions are exercised with a view to safeguarding and promoting the welfare of children in accordance with [KCSIE 2023](#), [Working Together to Safeguard Children](#) and [The Education act 2002](#).

Due to our position within The Create Approach Ltd and the nature of our work, our position often allows us to be able to observe potential outward signs of abuse and changes of behaviour in children and young people. Due to our role however, staff may also be open to accusations of abuse. Such allegations may be true, but they may also be false, misplaced or malicious.

This policy is to be used in conjunction with Part 4 of the Department for Education statutory guidance document [Keeping Children Safe in Education](#).

It should be read in conjunction with the procedure for dealing with allegations of abuse against members of staff and volunteers and other relevant statutory and guidance documents issued nationally or by the Department for Education and HM Government, as well as other related policies of The Create Approach Ltd.

This policy aims to ensure that all allegations are dealt with fairly, consistently and quickly and in a way that provides protection for the child/young person, whilst supporting the person who is the subject of the allegation. In the event a member of staff does not wish to report an allegation directly, or they have a general concern about malpractice within The Create Approach Ltd, reference can also be made to our whistle blowing policy. This policy complies with the framework for managing cases of allegations of abuse against people who work with children, as set out in relevant guidance and in the local inter-agency procedures; [Pan-Dorset Safeguarding Children Partnership](#).

Initial response

The police will be contacted immediately if a child has been harmed, if there is an immediate risk of harm to a child, or the situation is an emergency.

In cases where the police are not contacted immediately the DSL, Kelly Sherman, will conduct a basic enquiry in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation and then contact the LADO.

During this basic enquiry, the DSL, Kelly Sherman will ensure that any information that will be required by the LADO is collected and will be careful not to jeopardise any potential future police investigation. Once the DSL has conducted the basic enquiry, they will contact the LADO.

The DSL and LADO will discuss the nature, content and context of the allegation and decide if:

- No further action is needed.
- A strategy discussion should take place.
- There should be involvement from the police If the DSL, Kelly Sherman, is concerned about the welfare of other children in the community or the teacher's family, they will discuss these concerns with the LADO and conduct a risk assessment of the situation.
- If the allegation is about physical contact, e.g. restraint, the strategy discussion or initial evaluation with the LADO will take into account that facilitators and other staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. Further information about the use of reasonable force can be found at paragraphs 163- 165 in Part Two of this guidance and on GOV.UK - [Use of reasonable force in schools - GOV.UK \(www.gov.uk\)](#)

Where the allegation includes behaviour outside of support time, an assessment of transferable risk to children with whom the person works will be undertaken where appropriate; advice will be sought from the LADO where there is any doubt.

No further action

Where the initial assessment leads to no further action, the DSL and LADO will:

- Record the decision and justification for it.
- Agree on what information should be put in writing to the individual concerned and by whom.

Reporting lines

This policy applies to all facilitators of The Create Approach Ltd and Kelly Sherman, the founder of The Create Approach Ltd and DSL. All facilitators **must** report allegations without delay, in line with the following reporting lines:

- Allegations regarding another facilitator will be reported to Kelly Sherman, the founder of The Create Approach Ltd and DSL.
- Allegations regarding Kelly Sherman, the founder of The Create Approach Ltd and DSL will be reported to the Local Authority Designated Officer (LADO).

Contacting the LADO

If you have concerns regarding an adult who works with a child, then this should be reported to the Local Authority Designated Officer (LADO) within one working day.

The LADO will record all concerns, including allegations or offences emanating from outside of work. They will provide advice and guidance and help determine that the allegation sits within the scope of the procedures.

These roles are undertaken by the two Councils, and you can contact them as outlined below:

Bournemouth, Christchurch & Poole LADO:

In the first instance, please could you report your concern/allegation against a person who works with children in Bournemouth, Christchurch and Poole via our referral form which can be accessed [here](#). Please complete the form according to your particular circumstance. Once completed, the form should be sent directly to LADO@bcpcouncil.gov.uk, who will respond to your query as soon as possible.

If you are unsure whether the concern meets the Management of Allegations threshold for consideration, then please select the option for advice and guidance only within the form. The LADO will then contact you back via the contact details you provide in the form to discuss your query further.

If you would prefer to contact the LADO directly, or to discuss a concern that the LADO is already aware of, then please contact: 01202 817600 or LADO@bcpcouncil.gov.uk.

If the child lives in Bournemouth, Christchurch or Poole contact the Children's First Response Hub:

The Children's Services First Response Hub provides the public and professionals with advice, information and support for children who are vulnerable and at risk and is made up of the Multi-Agency Safeguarding Hub (MASH) and Early Help Team.

You can contact the [BCP First Response Hub](#) to request support, or to report a concern about a child or young person.

There is also a revised **inter-agency referral form**, further enhancing the speed and ease of referrals

Call **01202 735046** from 8.30am to 5.15pm, Monday to Thursday and 8.30am to 4.45pm on a Friday

Or e-mail direct on: childrensfirstresponse@bcpcouncil.gov.uk

Out Of Hours – The Children's Social Care Out of Hour's service is the emergency response service for any child who is in crisis, needs urgent help or is at serious risk of significant harm. Hours of operation are 5pm to 9am from Monday to Friday, all day Saturdays and Sundays and all bank holidays, including Christmas Day and New Year's Day.

Out of Hours Service on **01202 738256**

Email: ChildrensOOHS@bcpcouncil.gov.uk

Dorset LADO:

In the first instance, please could you report your concern/allegation against a person who works with children in Dorset, via our e-referral form which can be accessed here [Referral – Management of Allegations against people who work with children \(Dorset\)](#) . Please complete the form according to your particular circumstance. Once completed, the form will be sent directly to the LADO, who will respond to your query as soon as possible.

If you are unsure whether the concern meets the Management of Allegations threshold for consideration, then please select the option for advice and guidance only within the form. The LADO will then contact you back via the contact details you provide in the form to discuss your query further.

If you would prefer to contact the LADO directly, or to discuss a concern that the LADO is already aware of, then please contact **01305 221122** or LADO@dorsetcouncil.gov.uk

For more detailed advice on what to do if an allegation is made against a member of staff, please go the [Pan-Dorset Multi-agency Safeguarding Procedures](#) and refer to the [Richard Inquiry Report](#)

In case of emergency outside of the above hours please contact the **Out of Hours Team; Dorset**
If the child lives in Dorset contact the Children's Advice and Duty Service (ChAD):

Professional's Telephone Number: 01305 228558

Daytime service is available Monday to Friday between 8am and 10pm, Saturday and Sunday 9am to 10pm and On-Call Out of Hours Service 24/7

This is a professionals-only number to discuss your concerns, you will no longer complete a referral form.

The Dorset ChAD is being extended from 1 July 2023 to include an Early Help Hub and a multi-agency safeguarding hub (MASH). It will be a single point of contact and act as a 'front door' for all safeguarding concerns and early help referrals.

The LADO will:

- Be involved in the management and oversight of individual cases which meet the threshold.
- Provide advice and guidance to employers and voluntary organisations.
- Liaise with the police and other agencies.
- Monitor the progress of cases to ensure that they are dealt with as quickly as possible, with a thorough and fair consistent process.



Children with Special Educational Needs

We recognise that children with special educational needs (SEN) and or disabilities (SEND) can face additional safeguarding challenges on and offline. Children with SEN and or disabilities are especially vulnerable when identifying concerns due to their impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

All staff are aware that additional barrier can exist when recognising abuse and neglect for children with SEND and be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. They may not always show outward signs and may have communications barriers and difficulties in reporting challenges, especially involving exploitation or incidents involving peer on peer/child on child harm, abuse, or harassment and particularly where that harassment or harm is of a sexual nature. Our staff's vigilance will be a supporting factor to keeping all children safe.

Our policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children which include:

- Assumptions that indicators of possible abuse such as behaviour, 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; and communication barriers and difficulties in overcoming their ability to disclose incidents or the risk of harm they feel subject to.
- Addressing individual behaviour concerns and incidents considering the child's SEN and disabilities.

Recognising and having in place additional support for example to teach, advise, mentor and support children with SEND from online harms, hoaxes, bullying, grooming and radicalisation and enable them to have confidence and the ability to stay safe online, either in the centre or outside the centre environment.

Taking action where concerns are identified

Our staff recognise the difference between concerns about a child and a child in immediate danger.

If staff have concerns about a child, they will need to decide what action to take. A discussion should take place with the Senior Designated Safeguarding Lead, to agree a course of action.

If a child is in immediate danger or risk of harm a referral will be made immediately to the Multi-Agency Safeguarding Hub and/or immediately to the police if at imminent risk of harm by the member of staff if required, with the Designated Safeguarding Lead being informed of the referral.

If a child chooses to tell a member of staff about alleged abuse, there are a number of actions that staff will undertake to support the child:

- The key facts will be established in language that the child understands, and the child's words will be used in clarifying/expanding what has been said.
- No promises will be made to the child, e.g., to keep secrets.
- Staff will stay calm and be available to listen.
- Staff will actively listen with the utmost care to what the child is saying.
- Where questions are asked, this should be done without pressurising, and only using open questions.
- Leading questions should be avoided as much as possible.
- Questioning should not be extensive or repetitive.
- Staff will not/ should not put words in the child's mouth but will subsequently note the main points carefully.
- A full written record will be kept by the staff duly signed and dated, including the time the conversation with the child took place, outline what was said, comment on the child's body language etc.
- It is not appropriate for staff to make children write statements about abuse that may have happened to them or get them to sign the staff record.

- Staff will reassure the child and let them know that they were right to inform them and inform the child that this information will now have to be passed on.
- The Designated Safeguarding Lead will be immediately informed unless the disclosure has been made to them.
- Information should be shared with children's social care without delay, either to the child's own social worker or to the MASH. Children's Social Care will liaise with the police where required, which will ensure an appropriate police officer response rather than a uniformed response.
- The Police would only therefore be contacted directly in an emergency or if a child is in immediate risk of harm, abuse, or danger.
- If unsure, the MASH has available a Consultation Phone Line during office hours where a conversation (without naming children) can be used to speak with a qualified social worker. No record of the conversation will be made it is purely an advice line.

Staff should never attempt to carry out an investigation of suspected child abuse by interviewing the child or any others involved especially if a criminal act is thought to have occurred. The only people who should investigate child abuse and harm are Social Care, Police, or the NSPCC.

A P P R O A C H

Responding to a child who discloses (talks about) abuse.

All staff and volunteers will:

- Listen carefully to what is said.
- Avoid showing shock or disbelief.
- Observe the child's demeanour.
- Find an appropriate opportunity to explain that the information will need to be shared with others. They will **not** promise to keep the information confidential or a 'secret'.
- Allow the child to continue at her/his own pace and not interrupt if the child is freely recalling events. They will not stop him/her to find a 'witness' as this could inhibit the child from saying more.
- Avoid asking questions or pressing for more information. Ask for clarification only. If questions are necessary, they should be framed in an open manner and **not** 'lead' the child in any way: Tell me.... Explain.... Describe...
- Reassure the child, if necessary, that they have done the right thing by talking about it.
- Explain what will happen next and with whom the information will be shared.

If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken.

Where physical injuries have been observed, these will be carefully noted but not photographed. The staff member will not ask to see injuries that are said to be on an intimate part of the child's body.

Any disclosure or indicators of abuse will be reported verbally to the DSL, and concerns are immediate, ensure a referral is made without delay to:

If the child lives in Dorset

Contact the Children's Advice and Duty Service (ChAD): Professional's Telephone Number: 01305 228558

Daytime service is available Monday to Friday between 8am and 10pm, Saturday and Sunday 9am to 10pm and On-Call Out of Hours Service 24/7

This is a professionals-only number to discuss your concerns, you will no longer complete a referral form.

The Dorset ChAD is being extended from 1 July to include an Early Help Hub and a multi-agency safeguarding hub (MASH). It will be a single point of contact and act as a 'front door' for all safeguarding concerns and early help referrals.

If the child lives in Bournemouth, Christchurch or Poole contact the Children's First Response Hub:

Starting Monday 18th May 2020, there will be one phone number and one email address for all new contacts and referrals into BCP Children's Services – the Children's Services First Response Hub provides the public and professionals with advice, information and support for children who are vulnerable and at risk and is made up of the Multi-Agency Safeguarding Hub (MASH) and Early Help Team.

You can contact the [BCP First Response Hub](#) to request support, or to report a concern about a child or young person.

There is also a revised **inter-agency referral form**, further enhancing the speed and ease of referrals

Call **01202 123334** from 8.30am to 5.15pm, Monday to Thursday and 8.30am to 4.45pm on a Friday

Or e-mail direct on: childrensfirstresponse@bcpcouncil.gov.uk

Out Of Hours – The Children's Social Care Out of Hour's service is the emergency response service for any child who is in crisis, needs urgent help or is at serious risk of significant harm. Hours of operation are 5pm to 9am from Monday to Friday, all day Saturdays and Sundays and all bank holidays, including Christmas Day and New Year's Day.

Out of Hours Service on 01202 738256

Email: ChildrensOOHS@bcpcouncil.gov.uk

A written record will then be made of what was said, including the child's own words, as soon as possible and given to the DSL.

The Create Approach Ltd has a responsibility to take whatever action is required to ensure the child's safety and that of other children.

The DSL will decide whether to contact parents at this stage, judging whether to do so, it is necessary to consider if contacting the parents/carers is likely to place the child at risk of harm from their parent's/carers actions or reactions - for example in circumstances where there are concerns that a serious crime such as sexual abuse, domestic violence or induced illness has taken place. If in any doubt, the DSL or staff member will call the appropriate numbers as above and agree when

parents/carers should be contacted and by whom. The reason for the decision not to contact parents first will be recorded in the learner's file.



Responding to concerns reported by parents or others in the community.

If parents or other people in the local community tell staff at The Create Approach Ltd about an incident in or accumulation of concerns, they have about the family life of a child who accessing learning through the centre, the information cannot be ignored, even if there are suspicions about the motives of the person making the report. Members of staff will therefore pass the information to the DSL in the usual way.

Anyone can make a referral, not just DSLs.

It is important that everyone at The Create Approach Ltd is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for making a judgement about whether abuse has occurred and should not conduct an 'investigation' to establish whether the child is telling the truth. The role of staff at The Create Approach Ltd is to act promptly on the information received.



Educating Young People – Opportunities to teach safeguarding

KCSiE 2023 paragraphs 135 – 148.

The Create Approach Ltd will endeavour to teach children in an age-appropriate way about youth produced imagery, on-line risks associated with social networking to prevent harm by providing them with the skills, attributes, and knowledge to help them navigate risks, including covering online safety, remote learning, filters and monitoring, information security, cyber-crime, reviewing online safety platforms and use of mobile technology. We will ensure appropriate filters and monitoring systems in place and regularly review their effectiveness if they are to use electronic equipment at the centre.

The education we provide for online safety will consider the need for children to learn using online technologies in a safe environment whether that be whilst at The Create Approach Ltd, in the home or in a community environment.

We will ensure a whole centre approach is in place to promote giving children the space to explore key issues in a sensitive way and the confidence to seek the support of adults should they encounter problems or online harms, hoaxes or harassment including involving incidents of sexual violence and sexual harassment between children.

We will carefully consider mobile phone use and how this is managed at The Create Approach Ltd and ensure it is reflected in our mobile policy. This will include where children have unlimited and unrestricted access to the internet via mobile phone networks (i.e., 3G, 4G and 5G).

Our arrangements will be regularly reviewed to address this additional area of safeguarding as technologies change on a regular basis and having access to smart technology could mean some children, whilst at the centre, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (via large chat groups) and view and share pornography and other harmful content.

The Create Approach Ltd response to identifying, responding to, and managing concerns, incidents, or disclosures regarding sexual violence.

Whistleblowing (Please also refer to stand alone policy):

It is important that people within The Create Approach Ltd have the confidence to come forward to speak or act if they are unhappy with anything. Whistle blowing occurs when a person raises a concern about dangerous or illegal activity, or any wrong- doing within their organisation. This includes concerns about another employee or volunteer. There is also a requirement by The Create Approach Ltd to protect whistle-blowers. Please refer to our whistleblowing policy for more details.



Use of Mobile Phones and other Digital Technology (Please also refer to stand alone policy):

All employees, trustees and volunteers should be aware of The Create Approach Ltd policy and procedures regarding the use of mobile phones and any digital technology and understand that it is unlawful to photograph children and young people without the explicit consent of the person with parental responsibilities.



Social Media (Please also refer to stand alone policy):

All employees and volunteers should be aware of The Create Approach Ltd social media policy.

Learners are regularly reminded about online safety and bullying procedures and taught how to conduct themselves and behave in a responsible and respectful manner.



Single central record recording

The Create Approach Ltd has an excel template which we use to support the requirement for a single central record of all staff, volunteers and agency staff with all required information as requested in the safeguarding standards.

The record will be completed immediately when any changes occur and reviewed annually.

This record is held central by Kelly Sherman, the founder of The Create Approach Ltd. This information is available on request.



Virtual Schools

If The Create Approach Ltd is to work with virtual schools we will request to collaboratively work with the Designated Teacher to maintain good links with the Virtual School and to promote the educational achievement of previously looked after children.

The role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. The virtual school head should identify and engage with key professionals, helping them to understand the role they have in improving outcomes for children. This should include Designated Safeguarding Leads, social workers, headteachers, governors, Special Educational Needs Co-ordinators, mental health leads, other local authority officers.



Helplines and reporting

- Children can talk to a Child Line counsellor 24 hours a day about anything that is worrying them by ringing 0800 11 11 or in an online chat at <https://www.childline.org.uk/get-support/1-2-1-counsellor-chat/>
- Where staff members feel unable to raise an issue with their employer, or feel they have a genuine concern that is not being addressed we acknowledge they may wish to consider whistleblowing channels. Likewise, if parents and carers are concerned about their child, they can contact the NSPCC Helpline by ringing 0800 028 028 0295, or by emailing help@nspcc.org.uk

Anyone can also raise a concern via the Pan Dorset Safeguarding website <https://pdscp.co.uk/>



The following appendices are a part of this policy :

Appendix 1 - Flow Chart 'What to do if you are worried a child is being abused at risk of harm or neglect.

Appendix 2 -Template: Case Record and Chronology form

Appendix 3 -Template: Logging a concern about a child's safety and welfare

Appendix 4 -Template: Body Maps Guidance and Body



Appendix 1

The Create Approach Ltd Child Protection & Safeguarding Flow Chart

'What to do if you are worried a child is being abused. at risk of harm or neglect'

Actions where there are concerns about a child's welfare in and outside of centre

- Be alert to signs of abuse, question unusual behaviour or changes to presentation.

Where a child discloses abuse, neglect, sexual violence, or sexual harassment

- Listen to what they say, keep calm, reassure they are right to tell, and you will take action to help keep them safe.
- Inform them you need to share the information and what you are going to do next
- Do **not** promise confidentiality, you will need to share/ report the information to appropriate services.
- **DO NOT DELAY, take any immediate necessary action to protect the child and ensure the Designated Safeguarding Lead, Kelly Sherman, is informed or member of SLT in the**

Discuss concerns with the Snr Designated/Named Safeguarding Lead

- The Safeguarding Lead will consider further actions including consultation with Children's Social Care/ MASH (if a new concern).
- Concerns and discussion, decisions and reasons for decision should be recorded in writing and a 'confidential concerns' file should be opened, stored in line with the centre child protection policy.
- At all stages the child's circumstances should be kept under review and re-refer if concerned to ensure the child's circumstances improve – **the child's best interests must**

Still have concerns - Refer to MASH (Multi-Agency Safeguarding Hub) Social Care

Have child/families' personal details to hand and be

MASH Tel: 0300 500 80 90

Consultation Line Tel: 0115 977 4247

(Office Hours Monday to Friday)

If the child is at immediate risk dial 101 and ask for assistance

Record all decisions and actions, working to agreed outcomes and within timescales.

Safeguarding concern

Resolved /no longer held

Support has been agreed, record

Out of hours

Emergency

Duty Team

BCP 01202 738256

Dorset 01305 228558

Unmet needs identified

Decide what actions are needed to support the child.

Consult with the child young person, family, and relevant agencies:

Agree support, refer to NSCP guidance / Pan Dorset Safeguarding

Important Contacts:

Person responsible for Safeguarding

Name: Kelly Sherman (Founder of The Create Approach Ltd)
Email address: kelly@thecreateapproach.co.uk
Telephone number: 07547178417

Police

Emergency 999
Non-emergency 101

NSPCC Helpline

0808 800 5000

If you are concerned about a child's welfare or worried they are being abused, you can make a referral to Children's Social Care in Dorset by contacting:

Bournemouth, Christchurch & Poole – Children's First Response Hub:	01202 123334 childrensfirstresponse@bcpcouncil.gov.uk
Dorset - Children's Advice and Duty Service (ChAD) Professionals Number: This is a professionals-only number to discuss your concerns, you will no longer complete a referral form.	01305 228558
Dorset Families and Members of the Public:	01202 228866

In an emergency or out of hours contact:

Bournemouth, Christchurch & Poole Out of Hours Service:	01202 738256 childrensOOHS@bcpcouncil.gov.uk
Dorset Out of Hours Service:	01305 228558

Appendix 2

Case Record/Chronology

CONFIDENTIAL

Sheet Number:

Complete for all incidents of concern including where a 'logging the concern' sheet has not been completed. If one has been completed, then add a note to this chronology to cross reference (significant information may also be added).

Name:		
DOB:		Form:
Date	Information/Details of concerns or contact	Print Name and Signature

Appendix 3

Logging a concern about a child's safety and welfare

Part 1 (for use by any staff)


Learner's Name:	Date of Birth:
Date and Time of Incident:	Date and Time (of writing):
Name:	
Print	Signature
Job Title:	
Note the reason(s) for recording the incident.	
Record the following factually: Who? What (if recording a verbal disclosure by a child use their words)? Where? When (date and time of incident)? Any witnesses?	
Professional opinion where relevant (how and why might this have happened?)	
Note actions, including names of anyone to whom your information was passed.	

Any other relevant information (distinguish between fact and opinion).

Check to make sure your report is clear to someone else reading it. Please give this form to your Senior Designated Safeguarding Lead



Part 2 (for use by the Senior Designated Safeguarding Lead (DSL))

Time and date information received by DSL, and from whom.		
Any advice sought by DSL (date, time, name, role, organisation, and advice given).		
Action taken (referral to MASH/children's social care/monitoring advice given to appropriate staff/EHAF etc. with reasons. Note time, date, names, who information shared with and when etc.		
Parent's informed Y/N and reasons.		
Outcome Record names of individuals/agencies who have given information regarding outcome of any referral (if made).		

Where can additional information regarding child/incident be found (e.g. Pupil file, serious incident book)?		
Should a concern/confidential file be commenced if there is not already one? Why?		
Signed		
Printed Name		



Appendix 4

Body Map Guidance for Schools

Medical assistance should be sought where appropriate.

Body Maps should be used to document and illustrate visible signs of harm and physical injuries.

Always use a black pen (never a pencil) and do not use correction fluid or any other eraser.

DO NOT remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.

***At no time should an individual member of staff or school be asked to or consider taking photographic evidence of any injuries or marks to a child's person, this type of behaviour could lead to the staff member being taken into managing allegations procedures, the body map below should be used in accordance with recording guidance. Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g., MASH or the child's social worker if already an open case to social care.**

When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:

- Exact site of injury on the body, e.g., upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.

Ensure First Aid is provided where required and record.

A copy of the body map should be kept on the child's child protection file.

BODYMAP

(This must be completed at time of observation)

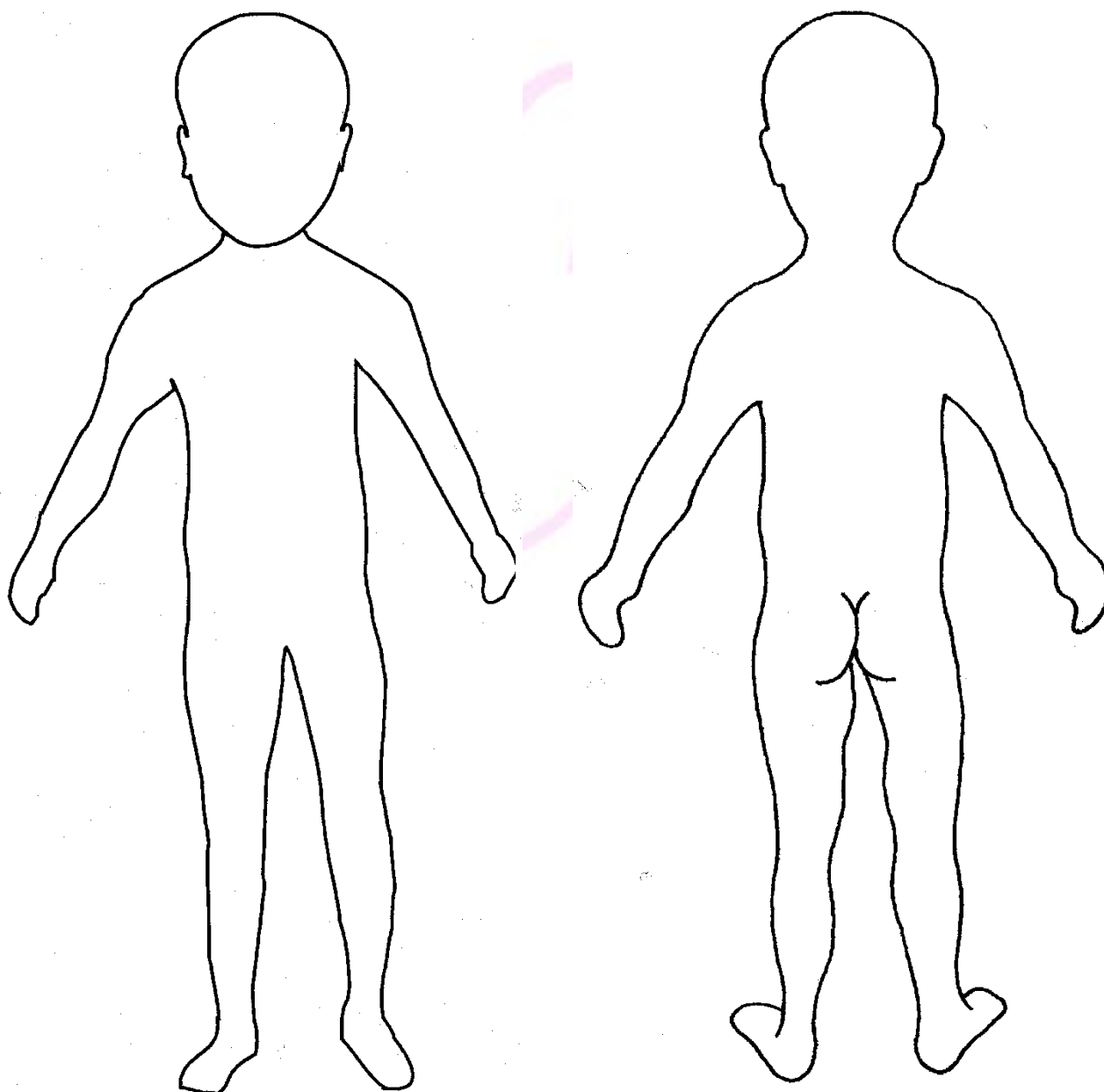
Names for
Child: _____

Date of
Birth: _____

Name of
Worker: _____

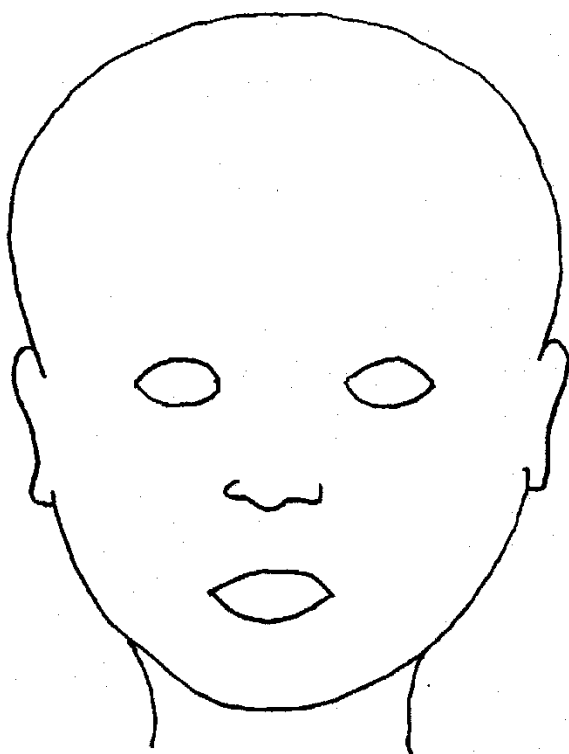
Agency: _____

Date and time of
observation: _____

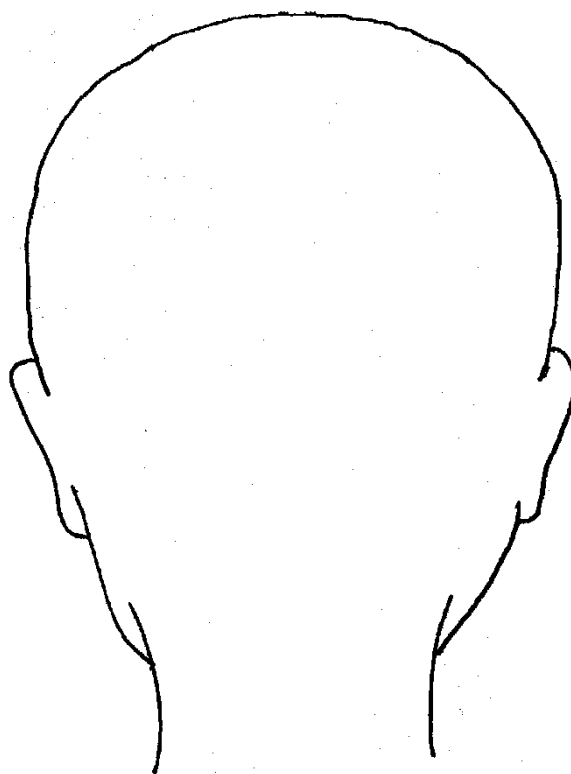


Name of
Child: _____

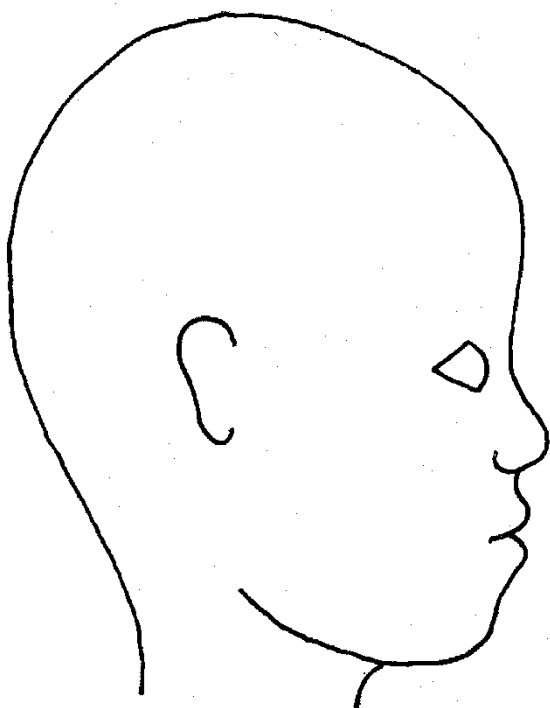
Date of
observation: _____



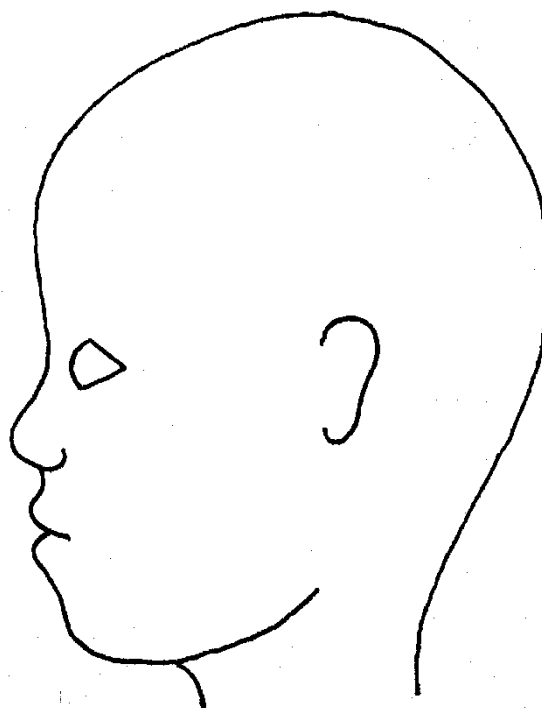
FRONT



BACK



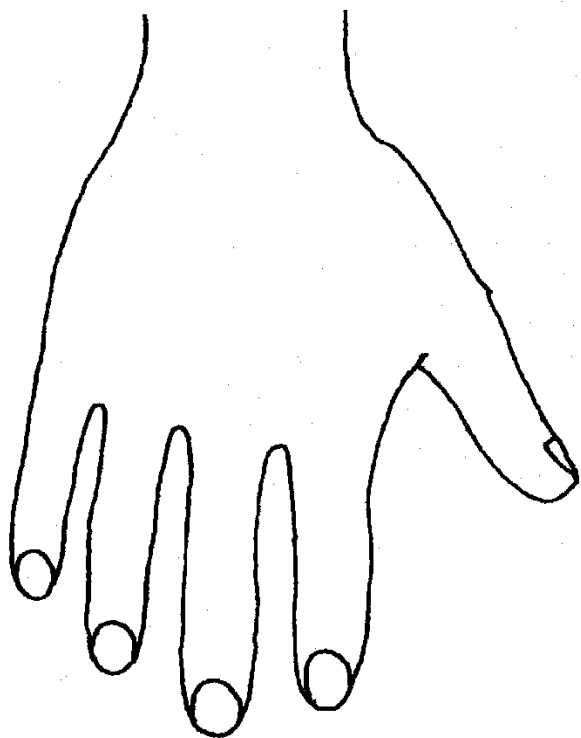
RIGHT



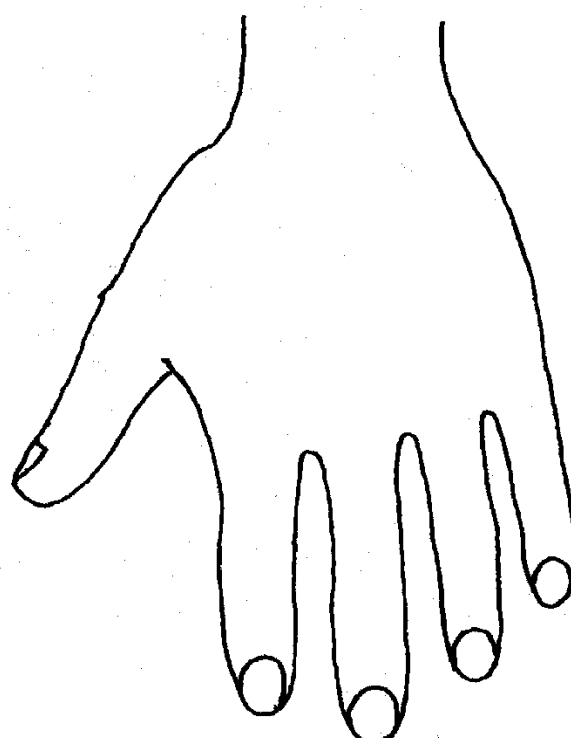
LEFT

Name of Child: _____

Date of observation: _____



R



L

BACK



R

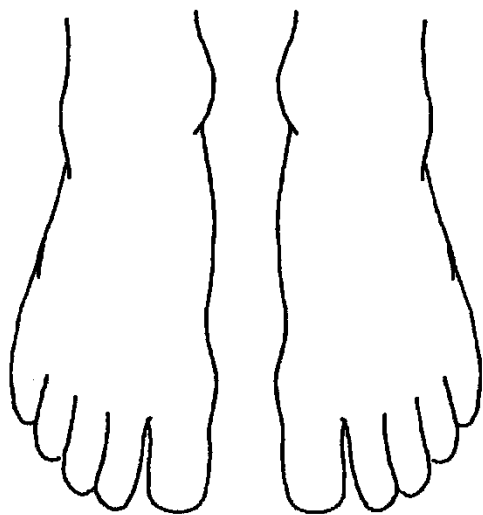


L

PALM

Name of Child: _____

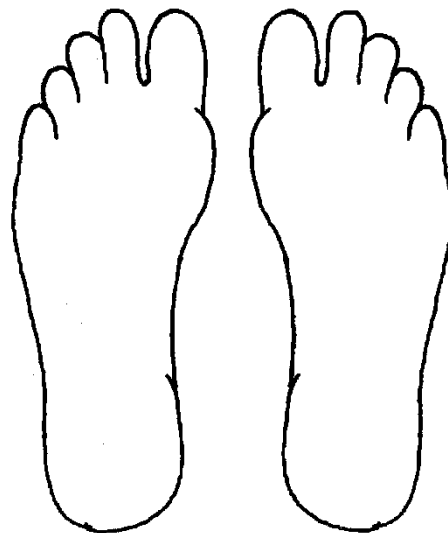
Date of observation: _____



R

TOP

L



R

BOTTOM

L

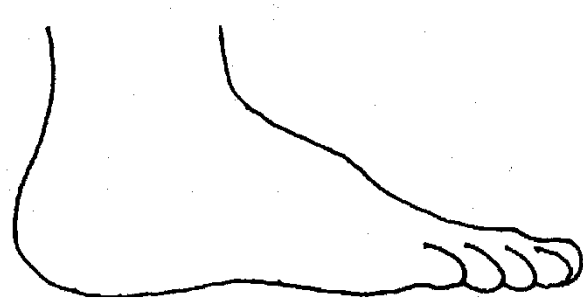


R



L

INNER



R



L

OUTER

Printed Name and
Signature of
worker:

Date:

Time:

Role of Worker

Other information:

Appendix 5

Record Keeping: Best Practice

1. Introduction

1.1 The importance of good, clear child welfare and child protection record keeping has been highlighted repeatedly in national and local Serious Case Reviews.

1.2 It is the Designated Safeguarding Lead (DSL)'s responsibility to ensure that child protection files, access, storage and transfer meet the required professional standards as detailed in this document.

1.3 The common law of confidentiality, Data Protection and Human Rights principles must be adhered to when obtaining, processing or sharing personal or sensitive information or records. In summary, the Data Protection Act requires that records should be securely kept, accurate, relevant, up to date and kept for no longer than is necessary for the purpose for which they were made.

1.4 Any electronic record keeping system should comply with the general standards set out below.

2. Record to be made by an adult receiving a disclosure of abuse (when a child talks about abuse).

2.1 This record should be made as soon as possible **after** the individual hearing the disclosure has reported it verbally to the DSL. The facts, not opinions (unless of relevance), should be accurately recorded in a non-judgemental way. It is important to remember that expressing an opinion as to whether the child is telling the truth is not helpful and can prejudice how a case proceeds.

2.2 The record should ideally be on a standard 'concerns' form but if this is not used, should include:

- The child's name, gender and date of birth
- Date and time of the conversation
- What was the context and who was present during the disclosure?
- What did the child say? – verbatim – in exact words. if possible.
- What questions were asked? – verbatim – in exact words. if possible.
- Responses to questions – verbatim – in exact words. if possible.
- Any observations concerning child's demeanour and any injuries
- The name of the person to whom the disclosure was reported.
- Printed name and job title of the author, followed by signature and date.

2.3 The record about a disclosure of abuse should be passed to the DSL and retained in the learner's child protection file in its original and contemporaneous form (as it could be used as evidence in court proceedings), even if later typed or if the information is incorporated into a report.

2.4 The Create Approach Ltd should never ask learners, regardless of their involvement in a child protection matter (i.e. the subject of an allegation, a witness or the alleged 'perpetrator'), to write out their 'statements' of what has happened. In some cases, this could have the unintended

consequence of jeopardising a child protection investigation. This applies regardless of whether the incident(s) took place within or outside of The Create Approach Ltd.

3. Records kept by the Designated Safeguarding Lead

3.1 As stated at 2.2 above it is useful and recommended practice for staff to have one standard pro forma for recording all 'welfare' and child protection concerns.

3.2 The concern form should be passed to the DSL who will make a judgement about what action needs to be taken, in accordance with local inter-agency safeguarding procedures. The decision about any action, will be recorded clearly by the DSL.

3.3 Concerns which initially seem trivial may turn out to be vital pieces of information later, so it is important to give as much detail as possible. A concern raised may not progress further than a conversation by the DSL with the parent, or, at the other end of the scale, could lead to matters being heard in a court.

3.4 All 'lower level' / pastoral concerns about a child's welfare, which will generally have been discussed with parents/carers, are kept in the child's main file but these records should **not** be labelled 'child protection'.

3.5 It is never good practice to keep learner welfare records in a diary or day-book system. Often it is only when a number of seemingly minor issues relating to an individual learner over a period of time are seen as a whole that a pattern can be identified indicating a child protection concern.

4. Starting a child protection file

4.1 A child protection file does not necessarily mean that the learner is or has been the subject of a child protection conference or plan. 'Child protection file' denotes a high level of concern which has warranted referral to/ involvement of, and in most cases assessment.

4.2 It is the responsibility of the DSL to start a child protection file when a social worker is or was involved, e.g.: -

- a) A formal referral is made by the centre to PDSCP on an inter-agency referral form.
- b) PDSCP inform the school they have commenced an assessment in relation to a learner resulting from information from another source.
- c) A child protection file is forwarded.
- d) A learner who is in care/looked after.

- e) A learner is privately fostered

4.3 A child protection file is never 'closed' or de-categorised. Once the Centre has started a child protection file, the chronology is maintained so that any future concerns can be considered in the context of past events, even if Social Care ceases involvement.

4.4 Where there is an allocated social worker because a child is disabled or a young carer and there are no child protection concerns then a child protection file should not be started.

5. The format of child protection files

5.1 It is helpful if individual files have a front sheet with key information about the learner and contact details of parents/carers, social worker and any other relevant professionals.

5.2 If the child is Looked-After the front sheet should include important information about legal status, parental responsibility, arrangements for contact with birth parents and extended family, levels of authority delegated to carers and the name of the virtual school head in the authority that looks after the child.

5.3 If a learner is or was subject of a child protection plan or in care/looked after, this should be highlighted in some way to make it immediately obvious to anyone accessing the record.

5.4 It is a multi-agency standard that children's child protection files must have at the front an up-to-date chronology of *significant* incidents or events *and* subsequent actions/outcomes. Maintaining the chronology is an important part of the DSL role; it aids the DSL, Deputy and others to see the central issues 'at a glance' and helps to identify patterns of events and behaviours.

5.5 It should make sense as a 'stand-alone' document: anyone else reading the chronology should be able to follow easily what the concerns are/have been, whether the concerns have escalated and why, plus the actions taken by the school to support and protect the child. This will be particularly useful for DSLs when learners transfer, for professionals involved in collating information for Serious Case Reviews and for parents/ learners /ex- learners if they view the record.

5.6 Once a chronology is started it should be updated as appropriate even if Social Care later ceases involvement.

5.7 The file should be well organised and include, as appropriate, any 'concern forms', copies of correspondence, reports to and minutes of child protection conferences, documents relating to children in care/'looked after' etc. The DSL will decide which relevant information which pre-dates the starting of the child protection file, such as CAF or other pastoral care documentation, will also be included.

6. Storage

6.1 All records relating to child protection concerns are sensitive and confidential so will be kept in a secure (i.e. locked at all times) filing cabinet, separate from other files, and accessible through the DSL, the Deputy(ies).

6.2 The learner's general file should be marked in some way (e.g. a yellow star) to indicate that a child protection file exists. All staff who may need to consult a learners file should be made aware of what the symbol means and to speak to the DSL if necessary if they see this symbol and have concerns. For example, a member of the office staff who is looking in the main file for a parent's contact details because of unexplained absence might decide to report this to the DSL if they see the indicator, in case the absence is significant.

7. Sharing of and access to child protection records

7.1 It is highly unlikely that all members of staff need to know the details of a learners situation, or that there should be widespread access to the records. Access to, and sharing of, information should be on a need-to-know basis, decided case by case. The DSL is the best person to decide this. Consideration must also be given to *what* needs to be shared. In general, the closer the day-to-day contact with the child, the more likely the need to have some information.

7.2 The child who is the subject of a child protection record has the right to access the file, *unless* to do so would affect his/her health or well-being or that of another person, or would be likely to prejudice a criminal investigation or a Section 47 assessment (which relates to significant harm) under the Children Act 1989.

7.3 Parents (i.e. those with parental responsibility in law) are entitled to see their child's child protection file, with the same exemptions as apply to the child's right to access the record. Note that an older learners may be entitled to refuse access to the record by his/her parents. As a guide, this applies to learners who are 12 years of age or above, if they are of normal development or maturity. Guidance before any action/decision/request will be sort from the registered education provision for which the child and young person has been referred and/or the funding provider and/or council safeguarding officers.

7.4 References by name to children other than the learners who is the subject of the file should be removed when disclosing records, unless consent is obtained from the individual/s concerned (or their parents/carers on their behalf). Care must be taken to ensure all identifying information is removed from the copy of the record to be shared.

7.5 Advice will be sought from a legal advisor or Dorset Data Protection Officer (01305 838125) <https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/data-protection> if there are any concerns or doubt about a learner or parents reading records. However, it is generally good practice to share all information held unless there is a valid reason to withhold it, e.g. to do so would place the learner or any other person at risk of harm. Any requests to see the learner's record should be made in writing to give time for confidential information, such as any details of other learners, to be removed.

7.6 In respect of requests from learners or parents for information which wholly or partly consists of an educational record, access should be granted within 15 working days. Viewing-only access to these records is free but it is reasonable to charge for copies on a sliding scale from £1 - £50 (maximum) depending on the number of pages. Guidance before any action/decision/request will be sort from the registered education provision for which the child and young person has been referred and/or the funding provider and/or council safeguarding officers.

7.7 However, should the request only seek access to a child protection file (which is not classed as an educational record), access should be granted within 40 calendar days. A discretionary maximum fee of £10 can be charged for viewing access to or a copy of a child protection record. Guidance before any action/decision/request will be sort from the registered education provision for which the child and young person has been referred and/or the funding provider and/or council safeguarding officers.

7.8 If the record to be disclosed contains information about an adult professional, that information can be disclosed if it relates to the performance by that person of their job or other official duties e.g. a reference to a facilitator in their supporting role. However, if the reference refers to that individual's private life, it should be removed (unless this relates to a child protection matter which is relevant to the record to be disclosed).

7.9 Child protection information should not normally be shared with professionals other than those from Social Care, the Police, Health or the Local Authority. Ofsted and other school inspectors can view individual child protection files. Information should not be released to parents' solicitors on request; advice should be sought from the learner's school for which they are on roll legal advisor in such cases. Guidance before any action/decision/request will be sort from the registered education provision for which the child and young person has been referred and/or the funding provider and/or council safeguarding officers.

8. Transfer of child protection records

8.1 When a learner transfers to another provision the DSL should inform the receiving establishment as soon as possible in person or by telephone that child protection records exist. The original records must be passed on either by hand or sent by recorded delivery, separate from the child's main file. Care must be taken to ensure confidentiality is maintained and the transfer process is as safe as possible.

8.2 If the records are to be posted, they should be copied and these copies retained until there has been confirmation in writing that the originals have arrived. They can then be shredded.

8.3 Whether child protection files are passed on by hand or posted, there should be written evidence of the transfer (such as a form or slip of paper signed and dated by a member of staff at the receiving centre) This receipt should be retained by the originating centre for 6 years (in line with guidance from the Records Management Society).

8.4. Open 'welfare' or pastoral records (i.e. where concerns or issues have been raised but there has been **no** referral to or involvement by a social worker) should also be passed on to the next provision for their information and can be included in the main file. In respect of data protection, parents/carers should be made aware that information is transferred in this way to enable the next placement to properly support their child. Most parents will understand the reason for this but if for whatever reason a parent disagrees with you passing on non-child protection documents, you should not do so.

9. 'Dual registered' learners

Where a learner is on roll at a school and starts to attend The Create Approach Ltd, the chronology and other relevant information in the child protection file should be copied and passed to the DSL at The Create Approach Ltd at the earliest opportunity. Because of the nature of such 'bespoke' arrangements for individual learners, the two DSLs should agree on which one of them will keep the chronology updated and how best to communicate to each other significant events and issues in relation to that learner.

10. Retention of records

10.1 - The Create Approach Ltd will retain the record for as long as the learner remains in at the centre and then transfer as described above.

10.2 - Guidance from the Records Management Society is that when a learner with a child protection record reaches statutory school leaving age, the last school attended should keep the child protection file until the learner's 25th birthday. It should then be shredded (and a record kept of this having been done, date, and why).

10.3 - The Independent Inquiry into Child Sexual Abuse has instructed relevant organisations, including schools and colleges, that they should NOT destroy, for the foreseeable future, any of their records that could potentially come within the scope of the inquiry (i.e. any records relating to sexual abuse).

11. Electronic child protection records

11.1 - Electronic records **must** be password protected with access strictly controlled in the same way as paper records.

11.2 - They should be in the same format as paper records (i.e. with well-maintained chronologies etc) so that they are up to date if/when printed, if necessary.

11.3 - Electronic files must not be transferred electronically to other schools unless there is a secure system in place but should be printed in their entirety, linked with paper documentation such as conference minutes and transferred as described above. When the receipt has been returned to confirm that the file has been received at the new school, the computer record should be deleted.



Important Contacts:

Person responsible for Safeguarding

Name: Kelly Sherman (Founder of The Create Approach Ltd)
 Email address: kelly@thecreateapproach.co.uk
 Telephone number: 07547178417

Police

Emergency – 999
 Non-emergency – 101

NSPCC Helpline

0808 800 5000

If you are concerned about a child's welfare or worried they are being abused, you can make a referral to Children's Social Care in Dorset by contacting:

Bournemouth, Christchurch & Poole – Children's First Response Hub:	01202 735046 childrensfirstresponse@bcpcouncil.gov.uk
Dorset - Children's Advice and Duty Service (ChAD) Professionals Number: This is a professionals-only number to discuss your concerns, you will no longer complete a referral form.	01305 228558
Dorset Families and Members of the Public:	01202 228866

Bournemouth, Christchurch & Poole Out of Hours Service (urgent referrals)	01202 738256 childrensOOHS@bcpcouncil.gov.uk
Dorset Out of Hours Service:	01305 228558