

Future Pathways

Safeguarding Policy 2023

Policy Review Date	Next Review	Written/Reviewed by	Summary of Alterations
September 2023	September 2024	L Meston P Meston Trustees	NA

Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE'S) statutory guidance **Keeping Education (2023)** and **Working Together to Safeguard Children (2018)**.

This policy is also based on the following legislation:

- **The School Staffing (England) Regulations 2009**, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.
- **The Children Act 1989 (and 2004 amendment)**, which provides a framework for the care and protection of Children
- Section 5B 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 to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
 - Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- **The Rehabilitation of Offenders Act 1974**, which outlines when people with criminal convictions with children
- Schedule 4 of the **Safeguarding Vulnerable Groups Act 2006**, which defines what 'regulative activity' is in relation to Children
- Statutory guidance on the Prevent duty, which explains schools' duties under the **Counter-Terrorism and Security Act 2015** with respect to protecting people from the risk of radicalisation and extremism.
- **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 (ECHR)
- **The Equality Act 2010**, which makes it unlawful to discriminate against people regarding protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular affecting pupils disadvantages affecting pupils (where we can show its proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
 - The Public Sector Equality Duty (PSED), which explains that we must have due regard unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm as sexual violence; homophobic, bi-phobic or transphobic bullying; or racial discrimination.

2. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and 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 feeling to act to prevent harm appendix one explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet the child's basic physical and slash OR psychological needs, likely to result in the serious impairment of the child's health or development. Appendix one defines neglect in more detail.

Sharing of nudes and semi- nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

The following two **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the children and social work act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as Clinical Commissioning groups) for an area within the LA
- The Chief Officer of Police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand 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 the child involved feels most comfortable with.

4. Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and or disabilities (SEND) or health conditions (see section 10).
- Are young carers.
- May experienced discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to believe in difficult situations - for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family's mental health needs.
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or all repeat occasions.
- Whose parent/carer has expressed an intention to remove them from Future Pathways to be home educated.

5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and trustees at Future Pathways and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended Future Pathways and offsite activities.

Future Pathways plays a crucial role in preventative education. This is in the context of a whole-provision approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned program of relationships, sex and health Education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, Prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship including signs of controlling behavior
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called on a based by violence such as forced marriage and FGM and how to access support.
 - What constitutes sexual harassment and sexual violence and why they are always unacceptable.

5.1 All Staff

All staff will:

Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

Sign a declaration at the beginning of each academic year to say they have reviewed the guidance.

Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).

Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the Staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the Behaviour Policy and the Online Safety Policy and the safeguarding response to children who are missing from education.
- The Early Help Assessment Process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that link to county lines).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home at Future Pathways and online.
- The fact that children who are LGBT+ OR who are perceived to be LGBT+ can be targeted by other children.
- What to look for to identify children who need help or protection.

(See section 15 for more detail)

5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team and our DSL is Lauren Meston. The DSL takes lead responsibility for child protection and wider safeguarding at Future Pathways. This includes online safety and understanding filtering and monitoring processes on our devices that works to keep pupils safe online.

During term time, the DSL will be available during the hours of 9am and 5pm for staff to discuss any safeguarding concerns they may have.

Contact Lauren on 07715 925357

Email Lauren@futurepathwayscic.com

When the DSL is absent, there are two deputy DSL's: Jack Hogg and Beckie Broadhead.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support other staff on child welfare and child protection matters
- Take part in strategy discussions and interagency meetings and all support of the staff to do so
- Contribute to the assessment of children
- Refer suspected cases as appropriate, to the relevant body (local authority children's social care, channel program, disclosure and Barring Service, and all police) and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of the filtering and monitoring systems and processes in place at Future Pathways.

The DSL will also:

- Keep the Staff and/or Safeguarding team informed of any issues.
- Liaise with local authority Case Managers and Designated Officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the policies.
- Be confident that they know what local specialist support is available to support all children involved up and (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access the support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- The full responsibilities of the DSL and deputy are set out in their job description.

5.3 The Board of Trustees

The trustees will:

- Ensure that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the DSL to account for its implementation.
- Be aware of it's obligations under the Human Rights Act 1998. The Equality Act 2010 and out local multi-agency safeguarding arrangement.

- Appoint an Accountability and Standards Group lead to monitor the effectiveness of this policy in conjunction with the Board of Trustees.

Accountability and Standards Safeguarding Lead is Pete Meston

Ensure all staff undergo Safeguarding and Child Protection training, including online safety and that such training is regularly updated and is in line with advice from the local authority.

Ensure that the Future Pathways has appropriate filtering and monitoring systems in place and review their effectiveness for stop this includes:

- Making sure that Future Pathways' leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
- Reviewing the [DfE's filtering and monitoring standards](#), and discussing with It staff and service providers what needs to be done to support the provision in meeting these standards.

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- Online safety is a running and interrelated theme within Future Pathways' approach to safeguarding and related policies.
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- Future Pathways has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.

Where another body is providing services or activities:

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
- Make sure there are arrangements for the body to liaise with the Future Pathways about safeguarding arrangements, where appropriate.
- Make sure that the safeguarding requirements are a condition of using Future Pathways' premises, and that any agreement to use these premises would be terminated if the other body fails to comply.

5. Confidentiality

Future Pathways understands that timely information sharing is essential to effective safeguarding.

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

The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals 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 consent would place a child at risk.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

If a victim asks Future Pathways staff not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

The DSL should consider that:

- Parents or 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.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of any children involved and in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The government information [sharing advice for safeguarding practitioners](#) include 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

Where staff are in any doubt about sharing information, they should speak to the DSL (or deputy) confidentiality is also addressed in this policy with respect to record keeping in section 14.

7 Recognising abuse and taking action.

Staff, volunteers, and trustees must follow the procedures set out below in the event of a safeguarding issue.

Please note- in this and subsequent sections, you should take any references to ‘the DSL to mean the DSL (or deputy DSL)’

7.1 If a child is suffering or likely to suffer harm, or an immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly.

Contact the police 101, (999) if emergency

7.2 if a child makes a disclosure to you.

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them, allow them to talk freely and do not ask leading questions. stay calm and do not show that you are shocked or upset.
- Tell the child they've done the right thing in telling you.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words using a Cause for Concern Form - stick to the facts, and do not put your own judgment on it.
- Sign the right up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1) and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- not feel ready or know how to tell someone that they are being abused, exploited or neglected.
- not recognise their experience as harmful
- feel embarrassed, humiliated or threatened for stop this could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a professional curiosity and speaking to the DSL if you have concerns about a child.

7.3 If you discover that fgm has taken place, or a pupil 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 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 pupil has already been subject to FGM, and factors that suggest a pupil may be at risk.

Any teacher who either:

- is informed by a girl under 18 that an act of FGM has being carried out on her,
- Or observed physical signs which appear to show that an active 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 other purposes connected with labour or birth.

must immediately report this to the police, personally. This is a mandatory statutory Duty, and teachers will face disciplinary sanctions for failing to meet it unless they're being specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils for signs for FGM.

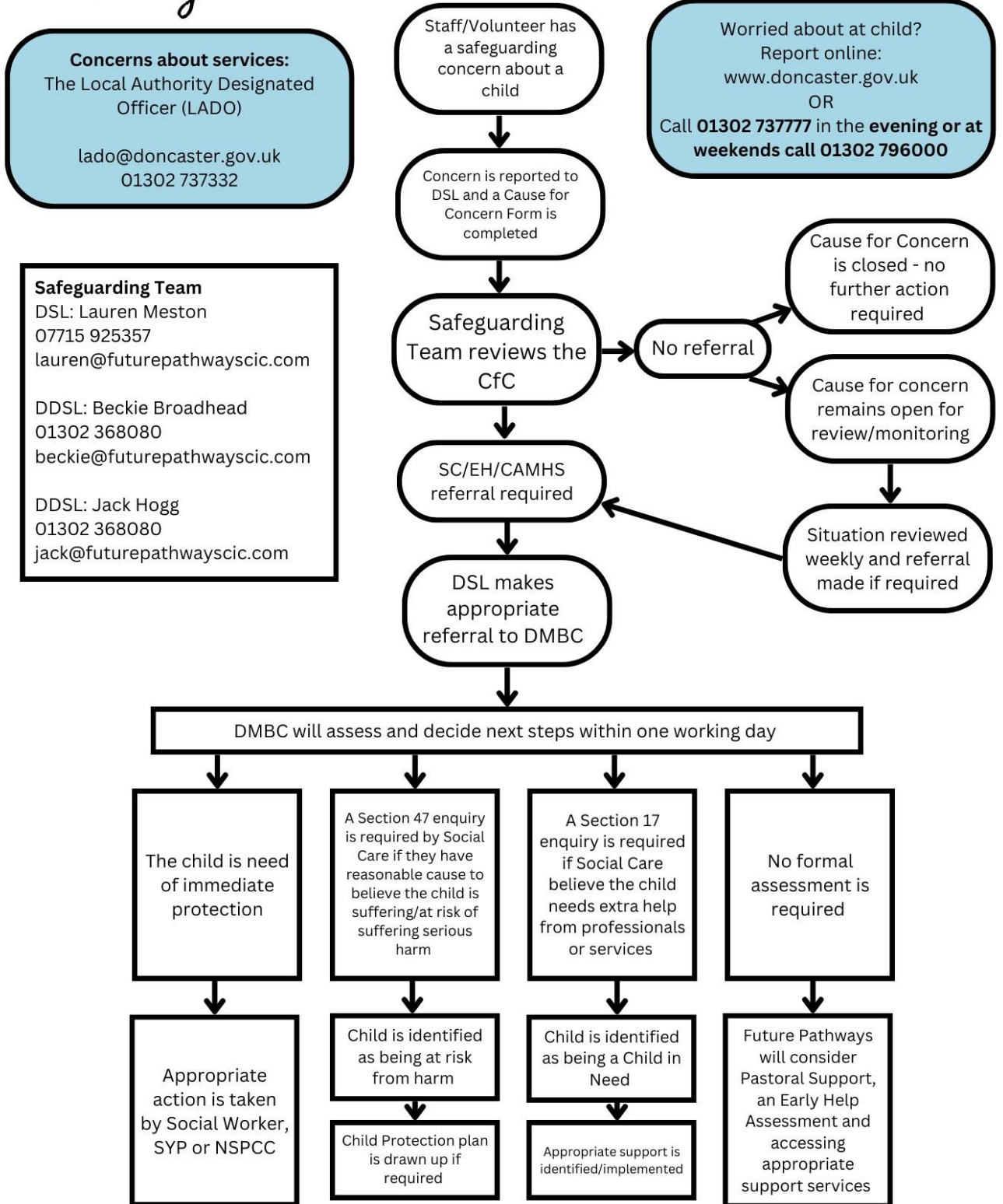
Any member of staff who suspects a pupil is at risk of FGM or suspects the FGM has been carried out or discovers that are pupil-aged 18 or over appears to have been a victim of FGM should speak to the DSL and follow local safeguarding procedures.

Call the police 101 or 999 in case of emergency.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Responding to Safeguarding Concerns



All concerns and correspondence will be kept in a secure and confidential file.

Figure 1 – Safeguarding Flowchart 2023

Where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also see advice at any time from the NSPCC helpline on 0808 800 5000 and then share details of any actions you take with the DSL as soon as possible.

Early Help Assessment

If an early help assessment is appropriate, the DSL will generally lead on this with other agencies and arranging assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the Future Pathways will consider a referral to local authority children and social care if the situation does not seem to be improving.

Referral

If it is appropriate to refer the case to local authority children social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome.

The LA will contact the person who made the referral. The DSL must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child situation improves.

7.5 If you have concerns about extremism.

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 a course of action full.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. make a referral to local authority children social care directly, if appropriate (see referral above). Inform the DSL or deputy 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.

The DfE also has a dedicated telephone helpline, 02073407264, which Future Pathways staff and governors can call to raise concerns about extremism with respect to a pupil or you can also email counter.extremism@education.gov.uk.

Please note, this is not for use in the emergency situations. In an emergency, call 999 all the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone maybe planning to travel to join an extremist group.
- See or hear something that maybe terrorist related.

7.6 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree to a course of action.

7.7 Concerns about a staff member, supply teacher, volunteer, or contractor

If you have concerns about a member of staff up and (including a supply teacher, volunteer, or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to Lauren Meston as soon as possible. If the concerns/allegations are about the Lauren Meston speak to the Local Authority Designated Officer.

Lauren Meston will then follow the procedures set out in appendix 3, if appropriate.

If the concerns/allegations are about Lauren Meston, the local authority designated officer (LADO) will carry out the next steps.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff, including the supply teacher, volunteer or contractor to Lauren Meston then this must be reported directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the premises for running an activity for children, follow our safeguarding procedures involving the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as banter, just having a laugh or part of growing up, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse, however all child on child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our behaviour policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- is serious, and potentially a criminal offence.
- could put pupils in the Future Pathways at risk or violence.
- involves pupils being forced to use drugs or alcohol.
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi nudes).

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- you must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the Victim(s) and the child(ren)) against whom the allegation has been made with a named person that can talk to if needed.

The DSL will contact the children and adolescent mental health services up and (CAHMS) if appropriate.

- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator.

We will work to mitigate peer on peer abuse, to achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders - for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation of violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously.
- Stay alerted to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect why the issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra- familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

Ensure staff are trained to understand:

- how to recognise the indicators and signs of child-on-child abuse and know how to identify and respond to reports.

- that even if there are no reports of child-on-child abuse at Future Pathways, it does not mean it is not happening - staff should maintain an attitude of “ it could happen here”
- that if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. for example:
 - children can show signs or act in ways they hope adults will notice and react to
 - a friend may make a report.
 - a member of staff may overhear a conversation.
 - a child's behavior might indicate that something is wrong.
 - that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
 - that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
 - the important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - that they should speak to the DSL if they have any concerns.
 - that social media is likely to play a role in the fall out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.
 - the DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent Future Pathways from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution - we will liaise with the police and/or local authority children's social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened well an independent investigation is ongoing.

7.9 Sharing of nudes and semi-nudes (“sexting”)

Based on guidance from the UK council for internet safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident.

- If you are made aware of an incident involving the consensual or non- consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘ youth produced sexual imagery’) you must report it to the DSL immediately.

You must not:

- View, copy, print, share, copy, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff - this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupils
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in the right order in order to safeguard the young person (in most cases, Images of videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms up and (this may be unknown)
- Whether immediate action should be taken to delete or remove images of videos from devices or online services

- Any relevant facts about the pupils involved which would influence risk assessment.

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

- the incident involves an adult.
- there is reason to believe that a young person has been coerced, black mailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- what the DSL knows about the images of videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
- the imagery involves sexual acts and any pupil in the images or videos are under 13.
- the DSL has reason to believe a pupil is at immediate risk of harm 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 Deputy DSLs, and other members of staff as appropriate, may decide to respond to the incident without involving the police or children social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL:

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

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

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done by the DSL.

Recording incidents

All incidents of sharing of nudes and semi nudes, and the decisions made in responding to them, will be recorded. The record keeping arrangements set out in section 14 of this policy is also applied to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and seminudes as part of our relationships and sex education and computing programs. Teaching covers the following in relation to the sharing of nudes and seminudes:

- What it is

- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- specific requests or pressure to provide (or forward) such images.
- the receipt of such images

This policy on the sharing of nudes and semi nudes is also shared with pupils so they are aware of the processes the Future Pathways will follow in the event of an incident.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- put systems in place for pupils to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
- make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

Reporting Systems come in the form of:

- Known trusted adult.
- Assigned mentor.
- Student council
- Mentor meetings
- Pastoral Sessions
- Through discussions in relationships/sex education curriculum

Any concerns or disclosures submitted should be dealt with appropriately in a timely manner providing reassurance throughout.

8 Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and well-being issues.

To address this our provision aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers.
- Protect and educate the whole Future Pathways community in its safe and responsible use of technology, including mobile/smart phones
- Set clear guidelines for the use of mobile phones for the whole Future Pathways community. established clear mechanisms to identify, intervening and escalate any incidents or concerns, where appropriate

The four key categories of risk

Our approach to online safety works by addressing the following categories of risk:

- Content - being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.
- Contact - being subjected to harmful online interaction with other users, such as peer to peer pressure, commercial advertising and adults passing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct - personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (EG consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce - risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

to meet our aims and address the risks above, we will:

- educate pupils about online safety as part of our curriculum. for example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognize unacceptable behaviour online
 - How to report any incidents of cyber bullying comma ensuring pupils are encouraged to do so, including where they're a witness rather than a victim.

All staff:

- are trained, as part of their induction, on safe internet use and online safeguarding issues including cyber bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresh your training as required and at least once each academic year.

- will communicate directly to parents/carers regarding any concerns around online safety. We will also share clear procedures with, so they know how to raise concerns about online safety.

We will make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- staff are allowed to bring their personal phones to Future Pathways for their own use but will limit such use to non-contact time when pupils are not present.
- make all pupils, parents/carers, staff, volunteers are aware that they are expected to sign an agreement regarding the acceptable use of the internet at Future Pathways, use of the Future Pathways ICT systems and use of their mobile and smart technology.
- explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile for phones.
- make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils phones, as set out in the DFE guidance on searching, screening and confiscation
- put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk (described above) from the Future Pathways IT systems.
- provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

9 Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will carefully consider what information we provide about the other child involved. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.

- meet with the alleged perpetrators parents or carers to discuss support for them, and what's being put in place that will impact them, EG, moving them out of classes with the victim, and the reason(s) behind any decision(s)

10 Pupils with special Educational Needs, disabilities or health issues

We recognise that pupils with SEND, or certain health conditions can face additional safeguarding challenges, and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- pupils being more prone to peer group isolation of bullying (including Prejudice based bullying) than other pupils.
- the potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- communication barriers and difficulties in managing or reporting these challenges.

We offer extra pastoral support for these pupils for stop this includes:

- peer mentor
- assigned adult mentor.
- regular one to one pastoral check-ins

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11 Pupils with a social worker

Pupils may need a social worker due to welfare or safeguarding needs. we recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupils safety, welfare and educational outcomes. for example, it will inform decisions about:

- responding to unauthorised absence on missing education where there are no safeguarding risks
- the provision of pastoral and/or academic support

12 Looked after and previously looked after children

We will ensure that staff have the skills, knowledge and understanding to keep looked after children and previously looked after children safe. In particular, we will ensure that:

- appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- the DSL has details of children's social workers and relevant supporting agencies.

Our DSL will take the lead on promoting the educational achievement of looked after and previously looked after children.

They will work closely with the DDSLs to ensure that any safeguarding concerns regarding looked after and previously looked after children are quickly and effectively responded to.

They will promote the educational achievement of looked after and previously looked after children.

They will attend CIN, CP and LAC Reviews alongside any Strategy meetings.

They will report non-attendance or absconding from education immediately to social worker and all relevant parties.

13 Complaints and concerns about safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be hand handled in accordance with our procedures for dealing with allegations of abuse against staff.

13.2 other complaints/concerns

Complaints against the premises can be reported to trustees@futurepathwayscic.com or the Local Authority.

13.3 Whistle blowing

The whistle blowing policy covers concerns regarding the way Future Pathways safeguards pupils - including poor or unsafe practice, or potential failures.

14 Record keeping

We will hold records in line with our GDPR Policy.

All safeguarding concerns, discussions comment decisions made and the reasons for those decisions, must be recorded in writing. if you are in any doubt about whether to record something, discuss it with the DSL.

records will include:

- a clear and comprehensive summary of the concern – Cause for Concern Form
- details of how the concern was followed up and resolved.
- a note of any action taken comment decisions reached and the outcome.
- concerns and referrals will be kept in the separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the Future Pathways.

If a child for whom the Future Pathways has, or has had, safeguarding concerns moves to another provision, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new provision/ College to have support in place when the child arrives, this should be within:

- Five days for an in-year transfer, or within
- The first five days of the start of the new term

In addition, if the concerns are significant or complex, and/or social Services are involved, the DSL will speak to the DSL of the receiving provision and provide information to enable them to have the time to make any necessary preparations to ensure the safety of the child.

Sharing of files

Files will be shared through encryption protected emails.

15 Training

15.1 All staff

All staff will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the Future Pathways safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- be integrated, aligned and considered as part of the whole Future Pathways safeguarding approach and wider staff training, and curriculum planning.
- include online safety, include an understanding of the Expectations, roles and responsibilities for staff around filtering and monitoring.

All staff will have training on the government prevent and radicalisation strategy, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

All staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails and staff meetings)

All volunteers will receive appropriate training if applicable.

15.2 the DSL and deputy

The DSL and deputy will undertake child protection and safeguarding training at least every two years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example meeting other DSLs at the Doncaster DSL Network Event or taking time to read and digest safeguarding development). They will also undertake prevent awareness training.

15.3 Recruitment - interview panels

At least one person conducting any interview for any post at the provision we'll have undertaken safer recruitment training. This will cover, as a minimum, the contents of keeping children safe in education cover and will be in line with local safeguarding procedures.

15.4 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

16 Monitoring arrangements

This policy will be reviewed annually by Lauren Meston

17 Links with other policies

This policy links to the following policies and procedures

- Behaviour Policy
- Staff code of conduct
- Complaints
- Health and safety
- Attendance Policy
- Online safety policy
- Equality and Diversity Policy
- Whistleblowing Policy

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child although it may occur alone.

Emotional abuse may involve:

- conveying to a child that they are worthless or unloved, inadequate, only valued if they meet the needs of another person.*
- not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate*
- developmentally inappropriate expectations 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 participating in normal social interaction.*
- seeing or hearing the ill treatment of another*
- serious bullying (including cyber bullying) causing children frequently to feel frightened or endangered, all the exploitation and corruption of children.*

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing*
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to be in the sexually inappropriate where, or grooming a child in preparation for abuse (including via the internet).*

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve apparent or carer failing to:

- *provide adequate food, clothing and shelter (including exclusion from home or abandonment)*
- *protect a child from physical and emotional harm or danger.*
- *ensure adequate supervision (including the use of inadequate caregivers)*
- *ensure access to appropriate medical care or treatment*
- *it may also include neglect of, or unresponsiveness to, a child's basic emotional needs.*