



## Child Protection and Safeguarding Policy

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### Policy Discription

- This Policy is for Safeguarding & Child Protection for Star Light Alternative Provision.
- This policy is inclusive off all projects under the umbrella of Star Light Alternative Provision.
- This document outlines the policy of this organisation in relation to dealing with child safeguarding and the protection of children from abuse.
- This policy should be read in conjunction with all related Star Light Alternative Provision policies.

## **Policy Introduction**

**Star Light Alternative Provision** consider the rights of all the children that access their services. Children with disabilities and additional needs have the same rights and opportunities as other children. This includes the rights of all children and young people to be safeguarded and protected from all forms of abuse and neglect. **Star Light Alternative Provision** are committed to developing and maintaining a robust and transparent child protection policy to afford to all children who receive their services maximum safeguards.

1. the children we encounter in the course of providing services may be at risk of abuse in varied forms
2. abuse may be committed by the staff of organisation providing care or by others who are in a position of trust with a child
3. **Star Light** has a duty to do everything possible to prevent, report and tackle abuse wherever encountered.

“Safeguarding children is action taken to promote the welfare of children and protect them from harm. Safeguarding is everyone’s responsibility.” Working Together to Safeguard Children (2018) (2023 updated version)

The effective implementation of **Star Light Alternative Provision** approach to safeguarding children is based on and reflects the principles recognised in UK legislation, namely that:

- The welfare and protection of children is paramount whatever the circumstances.
- All children and young people, regardless of age, disability, gender, racial heritage, religious beliefs, sexual orientation or identity, have the right to protection from all types of harm and abuse.
- Recognition of the importance of working in partnership with parents, carers and other agencies including those of diverse communities.
- It is the duty of all members of staff that access and support children through **Star Light Alternative Provision** to be vigilant regarding the welfare of children with whom they have contact in the course of providing services. Staff likely to be in contact with children and their families will be trained to recognise the signs of abuse when they occur and to respond in accordance with national and local child protection policies and procedures.

**All Care/Support/Volunteers/Managers/teachers and social work staff are responsible for ensuring:**

- They are familiar with all relevant internal policies, safeguarding and child protection procedures, safeguarding guidance, documentation and access available training regarding safeguarding of children and young people from **Star Light Alternative Provision**.
- They contribute in a case conference or strategy meeting regarding safeguarding issues relating to a child or young person as required.
- They record accurately and factually all safeguarding concerns.
- They report all safeguarding and child protection concerns in a timely manner to **the Star Light Alternative Provision** Management Team and Designated Safeguarding Lead.

## **Emergency situations**

If the situation is an emergency, with a child in immediate danger, staff should take urgent action to intervene and call for assistance as soon as possible. They should give any necessary first aid and contact appropriate emergency services if necessary. If the perpetrator remains present, staff should seek to calm the situation. Staff have a right to avoid putting themselves at risk of violence or harm.

**The management team and Designated Safeguarding Lead are responsible for:**

- Have a senior board level (or equivalent) lead to take **leadership** responsibility for their schools safeguarding arrangements'. The named lead is Samantha Gurdin
- Ensure that the school contributes to multi-agency working in line with [Working Together to Safeguard Children](#) (2018, updated July 2022).
- Be aware of the local multi-agency safeguarding arrangements.
- Receive appropriate safeguarding and child protection (including online safety) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in the school are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- As part of the whole school safeguarding approach, they must create a culture that safeguards and promotes the welfare of children and young people in their school. This includes ensuring that robust recruitment procedures are in place that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools. (Please see the *Safer Recruitment Policy*).
- Be responsible for ensuring an appropriate senior member of staff, from the school leadership team, is appointed to the role of **designated safeguarding lead (DSL)**. With the support of directors and senior leaders, the DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). **This should be explicit in the role-holder's job description.**
- Be aware of their obligations under the [Human Rights Act 1998 \(HRA\)](#) and the [Equality Act 2010](#), which require schools to:
  - Act in a way that respects and protects an individual's human rights when they make individual decisions about them. In particular, the right to: education, freedom from inhuman and degrading treatment, and respect for private and family life. These rights must be protected and applied without discrimination.
  - Carefully consider how pupils are supported with regard to particular protected characteristics, including disability, sex, sexual orientation, gender reassignment and race. Proportionate positive action can be taken to deal with particular disadvantages affecting those with a protected characteristic to meet their specific need. This includes a duty to make reasonable adjustments for disabled pupils and those with long term conditions.
  - Guidance to help schools understand how to fulfil their duties under the [Equality Act \(2010\)](#) is available on the DFE website: [Advice for schools](#)
- Ensure that pupils are taught about how to keep themselves and others safe, including online. This education should be tailored to the specific needs and vulnerabilities of individual pupils.

- Do all that they reasonably can to limit pupil's exposure to online risks from the school's system, including:
  - Ensuring the school has appropriate filters and monitoring systems in place, that are informed in part by the risk assessment required by the [Prevent Duty](#), and that their effectiveness is regularly reviewed.
  - Work closely with senior leaders, the DSL and IT service providers in all aspects of filtering and monitoring.
  - Ensuring that the school leadership team and relevant staff have an awareness and understanding of the appropriate online filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Consider the age range and developmental age of their pupils, the number of pupils and their needs, how often they access the IT system and the proportionality of costs verses safeguarding risks.
- Adhere to the DFE guidance [Meeting digital and technology standards in schools and colleges](#) that requires schools to:
  - identify and assign roles and responsibilities to manage filtering and monitoring systems.
  - review filtering and monitoring provision at least annually.
  - block harmful and inappropriate content without unreasonably impacting teaching and learning.
  - have effective monitoring strategies in place that meet their safeguarding needs.

[Cyber security standards for schools and colleges](#) can be found here and broader guidance on cyber security including considerations for governors and trustees can be found at [Cyber security training for school staff - NCSC.GOV.UK](#)
- Ensuring all staff receive the appropriate levels of safeguarding training.
- Staff supervision, safeguarding supervision and support is provided.
- Ensuring that the safeguarding child protection policy, procedures and guidance are accessible for all staff employed by **Star Light Alternative Provision**.
- When a manager receives a report of suspected, imminent or actual abuse of a child a referral to the Local MASH team will be made if appropriate. An internal investigation should be opened as soon as possible but care should be taken not to prejudice any action to be taken by police or social services.
- If the suspected abuser is a member of staff of this agency, the manager should initiate appropriate steps under the disciplinary procedure and Walsall LADO. Staff will take all possible steps to co-operate with further investigations by Children's Services or /and the police.
- Ensures all safeguarding incidents occurring on **Star Light Alternative Provision** premises or involving staff are reported to the relevant Local Authority Designated Safeguarding Officer and Ofsted if appropriate.
- Ensures anyone with a recorded offence are reported to the DBS where appropriate.
- All details associated with allegations of abuse will be recorded clearly and accurately. The record will be securely kept and the agency's rules on confidentiality carefully followed.

## **Safer Recruitment**

This organisation takes great care in the recruitment of staff, carries out all possible checks on recruits to ensure that they are of a high standard and will co-operate in all government initiatives regarding the sharing of information on staff who are found to be unsuitable to be involved in work which brings them into contact with children. DBS risk assessments will be completed should a member of staff have a positive DBS result.

**The main responsibilities of the Designated Safeguarding Lead (DSL) are to:**

- provide support to staff regarding safeguarding concerns.
  - lead on advising staff of any action to be taken due to a safeguarding concern.
  - ensure that children and young people are immediately safeguarded from harm and abuse.
  - ensure that there is appropriate cover during their absence, and that staff know who to approach if the DSL is unavailable.
  - liaise with local authorities and other professionals, sharing information and fully assisting with any enquiries.
  - adopt a child-focused and holistic approach ensuring the child/young person's wishes and feelings are taken into account when determining what action to take.
  - refer allegations to the Local Authority Designated Officer or local equivalent.
  - refer safeguarding concerns to placing and host local authorities.
  - refer suspected cases of radicalisation to local authority Prevent.
  - refer suspected case of FGM, Child Sexual Exploitation and trafficking to the police.
  - refer cases to the Disclosure and Barring Service after staff have been dismissed or there is suspected harm having been caused to a child;
  - liaise with the Safeguarding Lead and director if any allegations or suspected harm having been caused to a child by an employee, supply staff or volunteer ;
  - ensure that the school complies with the work of the local safeguarding partnership.
  - ensure that all staff receive regular update training in relation to safeguarding;
  - provide safeguarding updates to senior managers and school governors.
  - keep the Director (or equivalent) informed of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (See [PACE Code C 2019](#) and DFE Guidance, [Searching, Screening and Confiscation](#) for further information)
  - ensure that there is effective monitoring and oversight of all safeguarding concerns;
- promote the educational achievements of Looked After Children in line with the [Children and Social Work Act 2017](#)

- have details of the social worker for any looked after children and the name of the Virtual School Head in the relevant authority for any children with a social worker or previously looked after.
- Work closely together with IT Services and providers to meet the needs of the setting and requesting system specific training and support as and when required.
- Take lead responsibility for any safeguarding and child protection matters that are picked up through web filtering and monitoring systems in place. This includes overseeing and acting on filtering and monitoring reports, safeguarding concerns and checks to the filtering and monitoring systems.
- Investigate any attempted access of inappropriate sites as soon as possible and take appropriate action; and refer appropriately any attempted access of websites related to extremism under Prevent duties and local arrangements for reporting.
- have a thorough knowledge and understanding of the full [KCSiE 2023](#) guidance.

It is important that all staff understand the role of the DSL on their appointment within the school and as part of their induction. The DSL is responsible for ensuring that all staff understand their roles and responsibilities regarding safeguarding children and that a child-focused approach is taken. The DSL will assess safeguarding concerns within the context of young people's environments. This is known as contextual safeguarding.

The DSL must ensure that clear, concise and good quality documents are kept of all allegations or safeguarding concerns, including low level concerns. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each pupil. Records should include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- a note of any action taken, decisions reached and the outcome.
- reports about incidents of sexual violence should include the time and location, so action can be taken to make the location safer if required.

If in doubt about recording requirements, staff should discuss with the DSL (or deputy).

- Staff are **not** permitted to use personal mobile phone devices, cameras or digital recording devices at any time during operational hours within the school. Staff should be supported to safely store away their personal devices during these times in a lockable personal storage area, with personal keys provided to each staff member.

Staff are advised if they wish to take their personal devices out of storage, they are only permitted to do so during their designated break times, with the restriction of only doing so in the designated staff room area. Company devices will be provided as and where appropriate to support staff to capture images of any Learning & Development within the school. Visitors will also be made aware of the requirement for them to adhere to this procedure when arriving to site and undergoing the visitor sign in process.

- Staff must be aware and alert to the possibility of Early Help being needed for those pupils who have particular vulnerabilities, such as those who:
  - are disabled or have certain health conditions and specific additional needs;
  - have special educational needs (whether or not they have a statutory EHCP);
  - have a mental health need;
  - are young carers;

- are frequently missing/goes missing from care or from home;

### What to do if a pupil makes a disclosure

- Well promoted, easily understood and easily accessible systems should be in place for pupils to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

If a pupil discloses information to a member of staff, they must ensure that they:

- listen to the pupil and reassure them they are being taken seriously and that they will be supported and kept safe.
  - never give them the impression they are creating a problem by reporting abuse, sexual violence or sexual harassment. They must never be made to feel ashamed for making a report.
  - do not dismiss what the pupil tells them. All concerns must be acted upon rigorously;
  - do not promise to keep it a secret. The member of staff must explain that they have a duty to share information to keep them safe and protect them;
  - write down what the pupil tells them. This must be accurate and in the pupil's words;
  - immediately report the concerns to the DSL or deputy. If neither is available, the member of staff must report the information to the Headteacher (or equivalent) or Regional Director.
- All concerns, however small they may seem, **must** immediately be reported to the DSL. This must be done verbally and then followed up **on the same day** and documented on the school's recording system. The member of staff has a responsibility to ensure that action has been taken about the concern on the **following day**, and that the concern is documented on the system. If action is not taken in a timely way as the member of staff sees fit, they have a duty to escalate their concerns to one of the Directors.
  - As a result of an allegation or investigation a referral may be required. This can include referrals to Disclosure and Barring Service, Disclosure Scotland, Social Work England, Scottish Social Services Council (SSSC) and other professional bodies, including the Care Council for Wales (CCW), Teacher Regulation Authority/ General Teaching Council for Scotland (GTCS).
  - The Headteacher (or equivalent) of the setting is responsible for making the referral at the appropriate time. The timing of the referral can vary by nation and by the severity of the concern. The Headteacher (or equivalent) must be familiar with, and follow, the national requirements and make the referral at the appropriate time.
  - If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to the appropriate body must be made. **It is an offence in all UK nations not to make a referral to the appropriate disclosure body.**
  - If a referral is made, at the point of completion the Headteacher (or equivalent) must notify Walsall LADO of the referral and any other possible referrals to any relevant professional body in the United Kingdom, relating to the allegation made.
  - If an employee is dismissed from employment due to a safeguarding concern or allegation, a referral to DBS/ Disclosure England must be made.
  - Where a teacher is dismissed or their services are no longer used because of serious misconduct, or might have been dismissed, or services ceased to be used had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency)

## Partnership working and sharing information.

Partnership working and the sharing of information is key in keeping children safe. Everyone who has a role to play in caring for children has a duty to share good quality information with the relevant professionals in a timely manner.

## **General Data Protection Regulations**

All schools must ensure that they comply with the Outcomes First Group's Data Protection policy which incorporates the GDPR requirements. The GDPR works around the principles of consent and assumes the automatic right of privacy to all individuals. This applies to pupil's personal information, as well as that of staff and parents/carers.



**GDPR is not a barrier to sharing safeguarding information. Safeguarding concerns must always be passed on.** It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child if there is a lawful basis to process any personal information required.

Information can be shared without consent where there is good reason to do so, and the sharing of information will enhance the safeguarding of a child in a timely manner. It is legitimate to share information without consent where:

- it is not possible to gain consent.
- the school cannot reasonably be expected to gain consent; and
- if to gain consent would place a child or adult at risk.

Where there is any doubt, the DSL should contact Directors for clarification.

**All staff must complete the GDPR training. All staff have a responsibility to ensure that they comply with the GDPR requirements.**

Schools must ensure that they inform pupils, parents and carers of how their personal will be stored and information is used.

Schools must ensure that they hold emergency contact details of the parents/carers of pupils. This is to be done with the agreement of the parents/carers. In line with [KCSiE 2023](#) schools must hold more than one set of contact details for each pupil, where reasonably possible.

- Data breaches must be reported immediately to the **Star Light Alternative Provision** Data Protection Officer as set out in the Data Protection Policy.

Please also see:

[Information Sharing Advice for Safeguarding Practitioners](#)

[Improving multi-agency information sharing \(publishing.service.gov.uk\)](#)

## **Child-on-child abuse**

- All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), children of differing ages, as well as similar ages, can abuse one another.

Local Safeguarding procedures must be followed, and any incidents of sexual violence will be reported to the police. Schools should be part of discussion with statutory safeguarding partners.

- It is essential that all staff understand that abuse is abuse and the importance of challenging inappropriate behaviours between pupils. In addition to the information below, staff should familiarise themselves with the School's *Child-on-Child Abuse Policy*.

[KCSiE 2023](#) states: **“Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.”**

Staff must ensure that they create a school environment where pupil safety is paramount and where unacceptable or unsafe behaviour is not tolerated. Staff must be aware and alert to incidents of online abuse between children, consensual and non-consensual sharing of nude and semi-nude images, sexual violence and sexual harassment between pupils and bullying.

This includes upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause the victim humiliation, distress or alarm. Staff must be alert to possible signs of child-on-child abuse. Inappropriate language must be rigorously and consistently challenged.

- All staff should understand, that even if there are no reports in their schools, it does not mean it is not happening, it may be the case that it is just not being reported. Staff are advised to maintain an attitude of '**it could happen here**' and be vigilant to any signs.
- It is important that staff are aware that pupils may not find it easy to tell an adult about their abuse. Pupils can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a pupil has been harmed or a pupil's own behaviour might indicate that something is wrong. If staff have any concerns about a pupil's welfare, they should act on them immediately rather than wait to be told. **Staff must act immediately and report any concerns regarding child-on-child abuse to the DSL.**
- It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.
- Staff should explain to pupils in an appropriate way that the law is in place to protect them rather than to criminalise them. This should be explained in a way that avoids alarming or distressing them.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, e.g. 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,
- consensual and non-consensual sharing of nude and semi-nude images and or videos
- upskirting
- 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)

These forms of abuse can happen inside or outside of school both offline and online.

- A contextual safeguarding approach must be taken when considering possible child-on-child abuse. Children and young people who display harmful behaviours must be seen as potential victims themselves, and the wider environmental risks must be taken into account. Staff must challenge any gender bias or derogatory language used by staff or pupils. Staff must not dismiss any concerns brought to them by pupils. Staff can report concerns verbally, but they must ensure that all concerns are recorded onto the school's electronic recording system by the end of the school day.

It is also important to understand intra familial harms and any necessary support for siblings following incidents, this applies whether siblings attend the same or a different school.

When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour.

Schools must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.

- The DSL must deal with any concerns of child-on-child abuse immediately and sensitively. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.

The language used must be sensitive, non-judgemental and must not blame the victim. Victims must be supported and reassured that their safety and welfare within the school is the priority. Risk assessments must be implemented where necessary.

- Where the DSL believes that there has been significant harm caused to the pupil, a referral must be made to the local authority immediately. In agreement with the local authority, parents/carers must be informed. Where possible, as best practice, parents/carers are to be informed face to face.

If the local authority does not believe it meets their threshold for further action and the DSL is not in agreement, this must be challenged with the local authority.

#### **After the outcome/conclusion of the incident:**

- a contextual safeguarding approach must be taken;
- schools must take all necessary action to learn from the incident and prevent future incidents occurring, such as through targeted education around specific types of child-on-child abuse;
- support for the victim must be offered and provided where possible. Appropriate risk assessments must be implemented to provide reassurance and safety for the victim;
- schools must ensure that they **do not** adopt a victim blaming approach;
- the DSL must complete an investigation into the incident; The investigation must consider the incident itself as well as whether it is an isolated incident, and the personal circumstances of the young person who is alleged to have displayed harmful behaviour;
- if necessary, appropriate referrals must be made to support services for the young person who has displayed harmful behaviours;
- a risk assessment must be completed and implemented for the young person who has displayed harmful behaviours in order to safeguard them and other pupils.

#### **Bullying** (Please also see our *Anti-bullying Policy*)

- Severe or persistent forms of bullying can result in Significant Harm, which is why those providing services for children should have adequate policies, procedures and training to counter bullying. Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see. It can be subtle and insidious. Bullying can become part of the culture, recognised or believed by all or a significant number of people as 'acceptable'.
- **Star Light Alternative Provision** has a zero-tolerance approach to bullying. Staff must help pupils to understand what bullying is and how to report it. Bullying must be dealt with as a safeguarding matter. Staff must report any bullying concerns to the DSL **on the same day**. The concerns must be documented appropriately.

- Schools have a responsibility to ensure that those pupils who bully, are supported and helped to understand the impact of their actions.
- Please see the following government guidance on preventing and tackling bullying in schools: [Preventing and tackling bullying](#) , [Mental health and behaviour in schools](#)  
[Behaviour in schools: advice for headteachers and school staff](#) See [Rise Above](#) for links to materials and lesson plans

## Preventative Strategies

- It is important that pupils are taught about how to keep themselves and others safe, including online. This preventative education will be effectively tailored to the specific needs and vulnerabilities of individual pupils.

For pupils who are non-verbal or have limited receptive and expressive communication and learning disabilities, more direct on-going observation is often required to support them and keep them safe, along with the direct modelling of safe behaviour by those responsible for their care and education. The support required must be tailored to the individual pupil's needs and be included in their Care/support Plan.

- The school will take all appropriate action to ensure that pupils learn about appropriate relationships with adults, keeping safe, online safety as well as sex and healthy relationships. Relationship, Health and Sex Education (RSHE) lessons, Relationships Education, and

Relationships and Sex Education will focus on important age-appropriate issues in line with Government guidance. Staff must ensure that pupils have opportunity to learn about safe relationships between peers as well as who they can talk to if they have any concerns.

LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

A one-stop page providing teachers with support in teaching RSHE topics can be found here: [Teaching about relationships sex and health](#)

Pupils will be supported by staff to understand what abuse is. Pupils must be listened to and enabled to report any abuse or neglect at the earliest opportunity. They should be given information about how to report abuse or any concerns about possible abuse, and be able to access in private relevant websites or helplines such as Childline to seek advice and help.

- The school recognises that some pupils are more vulnerable by virtue of their complex health or behavioural needs, or disabilities. In these instances, all staff have a responsibility to be the 'eyes and ears' and report all concerns to the DS Lead.

## Online Safety and Security

There is a whole school/setting approach to online safety to help equip pupils with knowledge and understanding to stay safe online. The school helps and supports its pupils to recognise and avoid online

safety risks and to help build their digital resilience. This is integrated into everyday learning and covered in detail as part of the curriculum.

There are a range of resources to provide support for online safety in schools at: [childnet.com](https://childnet.com)

Pupils those who are non-verbal or have limited receptive and expressive communication and learning disabilities will need further support which may result in a specific communication plan for a particular child.

### **Working with Parents and Carers**

- **Star Light** will work with parents and carers to help keep pupils safe online. Parents and carers will be informed about what their children are being asked to do online, including the sites they will be asked to access and if their child will be interacting with others online.

Web filtering and monitoring helps to keep pupils safe from illegal and inappropriate content and that they are protected from extremism online when using the setting's Wi-Fi. The school works with the Group's IT Section to ensure that the filtering and monitoring systems are appropriate for the school, and are informed in part, by the risk assessment required by the Prevent Duty. The filtering and monitoring systems are reviewed at least annually.

South West Grid for Learning <https://swgfl.org.uk/> have created a [testing tool](#) that can be used to check the filtering system is blocking access to illegal child sexual abuse material, unlawful terrorist content and adult content.

If staff become aware of an online incident that is a cause for concern, they should:

- Provide reassurance to the pupil.
- Take immediate action to report any criminal offences to the police and social care.
- Inform the pupil's placing authority and family as appropriate.
- Review the supervision and support arrangements for the pupil accessing the internet.
- Check the privacy and security settings on the pupil's devices and account.
- Agree what action will be taken to prevent recurrence and reduce risk, the risk assessment should be reviewed and updated. Further online safety learning requirements should be considered for the pupil.

Digital technology and its related risks are developing rapidly. An annual review of the school's approach to online safety will take place, supported by an annual risk assessment that considers and reflects the risks pupils face. A free online safety self-review tool for schools can be found at <https://360safe.org.uk/> or [LGfL online safety audit](#)

UKCIS provide a range of resources to support schools to further develop a whole school approach towards online safety: [Using external expertise to support online safety education](#)

Further helpful resources for online safety:

UK Safer Internet Centre: [Appropriate Filtering and Monitoring](#)

UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings](#) DFE Advice [Harmful Online Challenges and Online Hoaxes](#)

National Crime Agency's CEOP education program: [ThinkuKnow](#)

LGFL [Undressed](#) provides advice about how to teach children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders

### Children who are absent from education

All staff must be aware of the risks associated with children who are absent from education, for prolonged periods and/ or on repeat occasions that can often be a vital warning sign of a range of safeguarding concerns including neglect, child sexual and child criminal exploitation, forced marriage, FGM, substance misuse or mental health problems.

Early identification and intervention is a priority. Schools must have appropriate procedures in place for monitoring the attendance of pupils in school. Attendance must be monitored through Senior Leadership and Team Meetings.

The DSL must contact the main emergency contact as detailed on the pupil's file should there be concerns regarding the pupil absent from education.

Staff must report all unauthorised absences to the DSL, who must make contact with the pupil's parent/carers immediately to establish the pupil's whereabouts. The DSL must inform the placing authority of pupils who are frequently absent.

The DSL is responsible for investigating any unexplained absences. Reasonable enquiries must be made to locate a pupil who is absent from education. The DSL **must** refer any safeguarding concerns regarding the absence of the pupil to the local authority. Cases where there are concerns regarding forced marriage or FGM must be referred to the police immediately. All information **must** be documented appropriately.

Pupils who are repeatedly absent from education are at particular risk of harm. Attempts must be made to talk to the pupil about why they are absent from education. Records must be kept of those discussions. Any safeguarding information which the pupil discloses must be shared **immediately** with the local authority. If the pupil discloses immediate safeguarding concerns, the DSL must share this information with the police.

The risk of exploitation and abuse increases for children and young people who go missing from home and school. It is important the school's response to persistently absent pupils and children missing in education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child in need, or already has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. (read Attendance Policy)

Please also see: [Children Missing in Education and Working together to improve school attendance](#) guidance, which includes information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

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

Exploitation is a form of child abuse and can include sexual and/ or criminal exploitation. It occurs when 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 financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect boys and girls and can include children who have been moved (referred to as trafficking) for the purpose of exploitation. The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that both boys and girls can be at risk of criminal exploitation. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Schools must write and implement a local exploitation procedure which staff must be familiar with. All staff **must** read the Group's Exploitation policy as well as refer to [KCSiE 2023](#)

All staff **must** know the definitions, signs and indicators of CSE, CCE and County Lines. DSL must provide ongoing training and learning to staff around exploitation. All staff **must** have training in exploitation.

Staff **must** report any concerns regarding exploitation **immediately** to the DSL and document their concerns appropriately **on the same day**. Where there are immediate concerns relating to a child's safety due to exploitation, DSLs must make a same day referral to the local authority and report the concerns to the police as well as to the Regional Director.

It is the responsibility of all staff to help children and young people know about grooming and exploitation. Schools must ensure that pupils know who to talk to if they have any concerns for themselves or other children.

Please also see [Multi-agency practice principles for responding to child exploitation and extra-familial harm](#)

## Serious violence

All staff should be aware of indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child or young person has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Further guidance for professionals can be found here:

[Advice to schools and colleges on gangs and youth violence](#)

[Criminal exploitation of children and vulnerable adults: county lines](#)



[County Lines Toolkit For Professionals](#) includes information on the signs of a child's involvement in county lines, published by the Home Office and The Children's Society.

### **'Honour'-based abuse including Female Genital Mutilation (FGM) and Forced Marriage**

Honour based abuse (HBA) can be described as practices which are used to control behaviour within families or other social groups in order to protect perceived cultural and religious beliefs and/or honour. The term 'honour-based abuse and violence' relates to the offender/s interpretation of the motivation for their actions. It is a violation of human rights and for young victims it is a form of child abuse and is a child protection matter.

HBA can affect people of all ages, but often begins early in the family home. Girls and women are particularly at risk; however boys and men are also affected and may be at heightened risk if there are factors around disability, sexuality and mental health. Those subjected to it may find it particularly difficult to seek help as usual avenues seeking help, through parents or other family members may be unavailable.

HBA can take many forms, it can include: forced marriage; female genital mutilation; Breast ironing; virginity testing and/or physical, sexual and economic abuse and coercive control. Victims can experience multiple forms of abuse and multiple perpetrators can be involved.

**If staff have a concern regarding a child or young person who might be at risk of HBA or who has suffered from HBA, they must speak to the DSL (or deputy).** As appropriate, the DSL (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care.

**Teachers and support staff, along with regulated health and social care professional in England and Wales, have a specific legal duty to report concerns regarding Female Genital Mutilation (FGM),** ([under Section 5B of the Female Genital Mutilation Act 2003, section 74 of the Serious Crime Act 2015](#)) If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. In suspected cases of FGM, staff must refer to the local authority as well as the police. The DSL will assist and support staff with this.

Staff must read and be familiar with statutory guidance regarding reporting FGM 'FGM Fact sheet': <https://www.gov.uk/government/publications/female-genital-mutilation-leaflet>

Since February 2023, the legal minimum age to enter into a marriage in England and Wales is 18. In these nations, it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk)

[A Forced marriage resource pack](#) has been designed to highlight examples of best practice and to help ensure that effective support is available to victims of forced marriage.

Multi-agency statutory guidance for dealing with **forced marriage**, can found

at: [The right to choose government guidance on forced marriage](#)

The DSL must ensure that immediate concerns regarding potential abuse, harm, honour-based abuse, CSE and Trafficking or Radicalisation are shared **immediately** with the LA and that staff have documented them appropriately.

### **Preventing Radicalisation and the Prevent Duty**

#### **Staff must be familiar with the Protecting Children from Radicalisation Policy**

- Star Light Alternative Provision fully recognises its responsibility to have arrangements in place to safeguard and protect children and young people from radicalisation. Section 26 of the Counterterrorism and Security Act 2015 places a statutory responsibility on schools to 'have due regard to the need to prevent people from being drawn into terrorism'. This is known as the [Prevent Duty](#)

All staff must be aware of the signs and indicators of radicalisation. Staff must be proactive in reporting any concerns, regardless of how small they may be, to the DSL who must assist staff to report all concerns regarding radicalisation to the Police as well as the Regional Director. Staff must document their concerns appropriately.

To safeguard children and young people who are vulnerable to radicalisation, DSLs will need to take a risk-based approach and consider an individual's behaviour in the context of wider influencing factors and vulnerabilities. Further information can be found at:

#### [Understanding and identifying radicalisation risk in your education setting](#)

DFE has produced a Self-assessment tool to help schools in England review their responsibilities under the Prevent duty, which can be found here: [Prevent duty self-assessment tool for schools](#). The tool helps schools to understand how well embedded their existing policies and practices are, and to encourage a cycle of continuous review and improvement. It contains requirements and recommends good practice activities to meet those requirements.

All staff must be aware of the local procedures relating to reporting radicalisation concerns.

### **Pupils requiring support with their Mental Health**

Star Light recognises that schools have an important role in supporting the health and wellbeing of their pupils.

Mental ill-health can be an indicator of a child or young person suffering or at risk of abuse, neglect or exploitation. All schools should have systems in place for identifying mental health problems and referring to appropriate agencies for additional support.

This will ordinarily be with the consent of the child/young person and their family. All details of concerns and any referrals or other support arranged for the child should be documented on the school's electronic recording system.

Schools can refer to the [Mental Health and Behaviour in Schools guidance \(2018\)](#). The guidance provides advice on how to create a whole school culture in promoting positive mental health outcomes for children and young people.

Public Health England provide [Every Mind Matters](#) to help teach RSHE providing simple, practical advice for a health mind.

Information on the Group's [Wellbeing and Clinical Services for children & young people](#) can be found on Engage.

## Physical Interventions

While every school creates an atmosphere of nurturing, unconditional positive regard and warmth, the Group recognises that on occasion it may be necessary to use physical intervention to keep a child or young person safe. Physical intervention must be a last resort and must always be proportionate. Once the child/young person is safe and calm, it is essential that there is a debrief with them. It should be an open discussion with the member of staff encouraging the pupil to talk about how they feel and understand what happened.

De-escalation techniques must be used in the first instance and children and young people are given time to regulate in a safe environment. Other pupils to be removed from the scene to prevent injury to others.

The intervention and the follow-up action must be recorded on the Recording System.

If a pupil makes an allegation after a physical intervention, it is important that the member of staff writes down as much information as possible. Staff must complete body maps immediately after the event and make an appropriate electronic record. Staff must also verbally inform the DSL (or deputy) and record it onto the school's electronic recording system. **Medical attention must always be sought for the young person.** Staff must inform their parents or carers/ those with parental responsibility.

Allegations of harm relating to physical interventions must be reported to the Director, Head of Safeguarding/Safeguarding Adviser ([safeguarding@ofgl.co.uk](mailto:safeguarding@ofgl.co.uk)) and the Local Authority Designated Officer or local equivalent.

## Allegations against staff

An allegation is any concern, complaint or disclosure that indicates a member of staff, agency staff, volunteer or contractor has:

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

All allegations must be treated seriously. Staff must maintain an open mind and suspend all judgement. Allegations must never be dismissed. When managing allegations, it is important that staff maintain a level of professional curiosity. Staff have a responsibility to look after themselves and not to place themselves into situations which could present as unsafe. Staff must report any concerns to the Regional Director and the DSL.

When a pupil makes an allegation about a member of staff, the member of staff receiving the complaint must:

- write everything down and document it on the school's electronic recording system.
- immediately report the allegation to the DSL (or deputy).

The DSL must:

- take all allegations seriously regardless of whether a pupil has made previous allegations;
- report allegations to the Local Authority Designated Officer or local equivalent within one working day;

- ensure that they follow the Managing Allegations Against Staff Procedure.
- If the allegation is regarding the Headteacher (or equivalent) then the Regional Director must be informed immediately. They will then seek advice from the Local Authority Designated Officer local equivalent.

**All allegations made against staff must be reported to:**

- the Regional Director
- Human Resources
- Group Safeguarding Team

Star Light Alternative Provision recognises that managing allegations can be challenging and will support with the process. Please refer to the Managing Allegations Procedure for further details.

It is the responsibility of the DSL to ensure that all allegations are managed in line with local safeguarding partnership procedures.

### **Low-level concerns**

Staff must understand what low-level concerns are and be aware of the process for addressing low-level concerns.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that **an adult working in or on behalf of the school** may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is not considered serious enough to consider a referral to the local authority designated officer or local equivalent. ([KCSiE 2023](#))

Examples may include but are not limited to:

- being over friendly with children; erosion of boundaries
- taking photographs of children on their mobile phone;
- having favourites; engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

All low-level concerns must be shared with the Headteacher (or equivalent) or DSL. The **DSL must inform the Headteacher (or equivalent)** of all the low-level concerns, in a timely fashion according to the nature

of each particular low-level concern. **The Headteacher (or equivalent) is the ultimate decision maker in respect of low-level concerns.**

If there are concerns about the headteacher/principal these concerns should be referred to a Director, . If there is a conflict of interest in reporting the matter to any of these internal colleagues, the concern should be reported directly to the local authority designated officer or local equivalent.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Written records must be kept of the concerns in chronological order to establish a full picture of what is happening and if any child or young person may be at risk. Records should be reviewed regularly so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher (or equivalent) should decide on an appropriate course of action.

### **Working with the Local Authority Designated Officer or local equivalent**

In all referrals, the DSL is the lead professional within the school for ensuring that a timely response is received from the local authority. If a response is received which the DSL believes is inappropriate and does not prioritise the child or young person's safety, this must be escalated to the Headteacher/or equivalent to agree further action.

### **Whistleblowing**

Safeguarding is everyone's responsibility. Star Light Alternative Provision recognises that on occasions staff may feel that they are unable to tell someone within their immediate place of work about any safeguarding concerns that they may have. Star Light also recognises that pupils will be unable to voice their concerns if they are in an environment where staff also fail to voice their concerns.

Staff have a duty first and foremost to the pupils in their school. Any concerns, regardless of how small they may seem, must be reported. DSLs and Headteachers (or equivalent) have a responsibility to ensure that they create an environment where staff feel safe to openly voice any concerns and feel listened to. It is also important that staff feel supported if concerns are raised about them. If staff see or hear about other colleagues' practice which they are concerned about, which potentially may cause emotional or physical harm to a pupil, or if the standard of care being provided falls short of expectations, they must report this.



## **Training Requirements**

All relevant staff working for and at Star Light Alternative Provision will be trained in level 2 Safeguarding and Child protection within six months of their employment, this will be included in their induction period. Their training will be updated at least every two years.

Volunteers who have unsupervised contact with children, young people and families to receive level 1 Safeguarding Training.

Managers to be trained in level 3 safeguarding and Child protection.

## **Monitoring**

- The Management team to work in partnership with the MASH team if required following a referral being made by Star Light Alternative Provision.
- Child Protection and Safeguarding training of Star Light Alternative Provision employees to be managed and reviewed by the management team.
- The management team will monitor any safeguarding incidents.
- Children where a safeguarding concern has been raised to be discussed as part of the Stars Light management and staff team meetings where appropriate to ensure due reflection and analysis has been considered in managing and supporting children and families.

## **Local Authority MASH teams and Out of Hours Services.**

- **Staffordshire County Council** MASH/Initial Response Service (IRS) :contact details of relevant organisations are as follows: 0300 111 8007 and select option 1.
- **Staffordshire County Council** Out of hours Outside of the hours above, or on weekends and bank holidays, please contact the Emergency Duty Team by phoning 0345 604 2886.
- **Walsall** - If you are concerned about a child in Walsall or need some advice by calling the Multi-Agency Safeguarding Hub on 0300 555 2866 out of office hours (evenings, weekends and bank holidays) by calling the Emergency Response Team on 0300 555 2922
- **Birmingham Multi-Agency Safeguarding Hub (MASH)** – 0121 303 1888
- **Sandwell Safeguarding Team** on 0121 569 3100 and speak to someone from Social Care
- **Wolverhampton Safeguarding** 01902 555392 Out of hours please call Emergency Duty Team on 01902 552999 Wolverhampton Safeguarding

## **References**

- Working together to safeguard children- A guide to inter-agency working to safeguard and promote the welfare of children (2018) Updated July 2022  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419595/Working\\_together\\_to\\_safeguard\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_together_to_safeguard_children.pdf)
- UNICEF

[United Nations Convention on the Rights of the Child](#) Article 12: *"You have the right to give your opinion and to be taken seriously on decisions that affect you..."* website accessed 2011

- Prevent Duty Guidance

2011 [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/44597/7/3799\\_Revised\\_Prevent\\_Duty\\_Guidance\\_England\\_Wales\\_V2-Interactive.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/44597/7/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf)

- Walsall Safeguarding Children Procedure and Guidance.

<https://walsallsp.walsall.gov.uk/>

- Walsall Right Help, Right Time Guidance.  
<http://www.legislation.gov.uk/ukpga/1989/41/section/47>

- Statutory Guidance on promoting the Health and well-being of Looked After Children (DH 2015)

- <https://www.gov.uk/government/publications/promoting-the-health-and-wellbeing-of-looked-afterchildren--2>