

Child Protection Policy and Procedures for TLG Bolton

(Written to comply with DfE statutory guidance – Keeping children safe in education, September 2021)

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1. Introduction

The TLG Centre and their staff form part of the wider safeguarding system for children. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred and coordinated. This means that they should consider, at all times, what is in the **best interests** of the child.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- **protecting children from maltreatment;**
- **preventing impairment of children’s mental or physical health or development;**
- **ensuring that children grow up in circumstances consistent with the provision of safe and effective care;**
- **and taking action to enable all children to have the best outcomes.**

This Child Protection Policy is for all staff, parents, management committee, senior leadership teams, volunteers and the wider school and TLG community. It forms part of the safeguarding arrangements for our school. It should be read in conjunction with the Staff code of conduct, E-Safety Policy, Behaviour Policy, Anti-bullying Policy Absconders and children missing from education or home Policy, Selection and recruitment Policy, Allegations against staff Policy, Health and safety Policy, H&S on trips and visits. It should also be read in conjunction with DfE Keeping Children Safe in Education Part 1.

Throughout this policy, reference is made to *children* and *young people*. These terms include *everyone under the age of 18*.

Wherever reference is made to *staff*, this includes *all TLG staff and volunteers*.

2. Roles and responsibilities

2.1 All staff

All those working regularly with children in TLG Education Centres must read 'Keeping Children Safe in Education – Part 1 (DfE 2021)', which sets out what all staff need to know, what they need to look out for and where they should report their concerns. Where appropriate, staff or volunteers not working directly with children may instead read 'Keeping Children Safe in Education – Annex A (DfE 2021)', which contains a condensed version of the information in KCSIE Part 1.

All staff have a responsibility to provide a safe environment in which children can learn and where children's welfare is promoted. All staff should be prepared to identify concerns and act immediately. They should be prepared to provide help, including extra internal day-to-day support, 'early help', or referral to local statutory services. Staff should expect to support social workers and other agencies following any referral. Staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.

As set out in the flowchart for child protection concerns (section 4.2), staff should initially discuss any concerns with the centre-based Designated Safeguarding Lead (DSL) or deputy, but in their absence action must not be delayed. **Any staff member** who has a concern about a child's welfare can make a direct referral to children's social care and can also seek advice from the School Development Manager or TLG Safeguarding Lead.

2.2 Centre-based Designated Safeguarding Lead (DSL) – Gareth Crossley

The DSL is the Head Teacher or a member of Senior Staff. They take lead responsibility for managing child protection referrals (including to Children's Social Care, the Police and Channel), safeguarding training and raising awareness of all child protection policies and procedures in their Centre. They do this with support from the Education Centre Development Team.

- They ensure that everyone in school (including staff, volunteers, sessional workers and other adults) is aware of these procedures and that they are followed at all times.
- They act as a source of advice and support for other staff (on child protection matters) and ensure that timely referrals to Children's Social Care are made in accordance with current local procedures. They liaise with safeguarding partners and work with other agencies as required. ['NPCC - When to call the police'](#) should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- When children leave the TLG Centre, they ensure their 'Concerns' records are transferred to their returning or new school/college as soon as possible. Secure transit should be used and confirmation of receipt should be obtained.

A DSL must be available for any out-of-hours activities. For residentials, there must be a DSL present, although it may be one from another TLG Centre.

2.3 Deputy DSL – Emily Hemsley

If for any reason the designated safeguarding lead is unavailable, the deputy designated safeguarding lead will act in their absence.

The activities of the DSL can be delegated to appropriately trained deputies, however the lead responsibility for safeguarding and child protection remains with the DSL. This responsibility cannot be

delegated.

2.4 Proprietor, Management Committee and Senior Education Centre Development (ECD) Team

The Proprietor, Managers and ECD Team ensure that the policies, procedures and training in the TLG Centre are effective and comply with the law at all times.

- They ensure that all required policies relating to safeguarding and child protection are in place and effective, reflect statutory and locally agreed guidance, advice and procedures and are reviewed at least annually. They ensure that the required policies are provided to parents and available on the Centre's website. They ensure that they are provided to new staff at induction through the Safeguarding Handbook and are subsequently followed by all staff.
- They ensure that there is a named designated safeguarding lead (DSL) and deputy safeguarding lead in place and provide support and accountability in their handling of concerns through the online Lighthouse system. They ensure the TLG Centre contributes to inter-agency working, in line with statutory and local guidance. They ensure that information is shared and stored appropriately and in accordance with statutory requirements.
- They ensure that all staff members undergo safeguarding and child protection training at induction and that it is then regularly updated.
- They ensure that pupils are taught about safeguarding, including online, ensuring that that appropriate filters and monitoring systems for online usage are in place. Our pupils will be taught how to keep themselves safe through teaching and learning opportunities, particularly within the PSHE and ICT curriculum.
- The proprietor, managers and ECD Team are responsible for ensuring the school follows recruitment procedures that help to deter, reject or identify people who might abuse children. It adheres to statutory responsibilities to check all adults working with children and has recruitment and selection procedures in place for both staff and volunteers (see the TLG Selection and Recruitment Policy and Volunteer Recruitment Process for further information). It ensures that visitors are appropriately supervised in school. There are procedures in place to handle allegations against any members of staff and volunteers and any such allegations are referred to the Local Authority Designated Officer (LADO). Any person in regulated activity that has been dismissed, removed or resigned due to safeguarding concerns is referred to the Disclosure and Barring Service (DBS) and consideration will be given as to whether the case should also be referred to the Secretary of State (via the Teacher Regulation Agency).

2.5 Senior Level Responsibility for Leadership of Safeguarding at TLG

The person with Lead Responsibility for Safeguarding across all TLG Centres, is Helen Laws. This person is a senior manager within the ECD Team and reports quarterly to TLG's safeguarding trustee. They have an appropriate level of training for this role, which is regularly updated.

The person named above has a responsibility across the whole organisation for raising awareness with staff around issues relating to the welfare of children and young people, and the promotion of a safe environment for the children and young people learning within TLG. They have oversight of all concerns raised and actions taken, providing an additional layer of accountability and support for centre-based DSLs and SDMs.

2.6 School Development Managers

SDMs line-manage the Head Teacher and are part of the school's management committee. The SDM is trained as a DSL and has a senior level of oversight of all concerns raised. They are able to provide support and accountability to the centre-based DSL and deputy in dealing with safeguarding concerns.

3. Recognising signs and symptoms of abuse

Keeping Children Safe in Education (DfE, 2021) defines abuse as a form of maltreatment of a child.

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

The four main types of abuse referred to in Keeping Children Safe in Education are:

- Physical
- Emotional
- Sexual
- Neglect

Our school is aware of the signs of abuse and neglect so we are able to identify children who may be in need of help or protection.

Safeguarding incidents and/or behaviours can be associated with factors outside the Centre and/or can occur between children outside the Centre. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

3.1 Specific safeguarding issues

National safeguarding issues

Part 1 and Annex B of DfE guidance, Keeping Children Safe in Education (2021)¹ contains important information about known specific forms of abuse and safeguarding issues that are nation-wide. Staff and volunteers should read this guidance and use the links to obtain further information and help gain the relevant skills and knowledge to safeguard our children. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on these and other specific safeguarding issues.

Local safeguarding issues

Some safeguarding issues are known to be particularly prevalent in particular areas of the country. Specific safeguarding issues that are particularly common in Bolton, include neglect; domestic abuse and violence; drug and alcohol abuse, CSE, often leading to children going missing from home, education or

¹ <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

care; and FGM. The Bolton Safeguarding Partnership website² provides links to the key priorities and campaigns, to local and regional multi-agency safeguarding guidance, a news feed and a document library containing current leaflets, assessment tools and templates.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information including definitions and indicators are included in DfE KCSIE Part 1 and Annex B.

Female Genital Mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

If any member of staff discovers that FGM appears to have been carried out on a girl under the age of 18 (either through disclosure or visual evidence – although it will be rare for teachers to see visual evidence as they should NOT be examining students), they **must personally report this to the police**, in addition to discussing the case with their DSL and involving children's social care.

The duty does not apply in relation to girls over the age of 18 or to 'at risk' or suspected cases, in which staff should follow local safeguarding procedures.

FGM is an example of so-called 'Honour-based abuse', along with Forced Marriage. It is likely that a mandatory reporting duty will be implemented on Forced Marriage, mirroring the duty already in place to report known cases of FGM.

Mental Health

All staff should also be aware that 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action

² <https://www.boltonsafeguardingchildren.org.uk/>

should be taken, following this child protection policy and speaking to the designated safeguarding lead or a deputy. KCSIE Part 1 provides links to further information and advice on mental health support for children.

Peer on peer abuse

Peer on peer abuse can happen both inside and outside of the Centre and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. Even if there are no reports in their Centre it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have *any* concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

Peer on peer abuse can manifest itself in many ways. This may include:

- 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, rape or sexual assault (this may include an online element);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Abuse of this kind should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. We do not tolerate any harmful behaviour in school and will take swift action to intervene where this occurs. We use lessons to help children understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Our school understands the different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators).

Any incidents of peer on peer abuse will be investigated and dealt with in line with our Behaviour policy, which outlines the actions that may be taken in response to such behaviour. All incidents of peer on peer abuse should also be recorded and dealt with as safeguarding concerns for the victim and perpetrator and any other child affected (whenever they are TLG students), ensuring that all individuals (victims, perpetrators and any other children affected) receive the support they need in addressing the issue.

Sexual violence and sexual harassment between peers

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

When dealing with any such incidents, please refer to TLG's Sexual violence or harassment between peers Policy.

Serious Violence

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

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. Advice for schools is provided by the Home Office – links listed in KCSIE – Part 1.

Preventing radicalisation

Protecting children from the risk of radicalisation is seen as part of TLG's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. TLG staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme. Contact details for the local Channel scheme can be found in Appendix A.

From 1 July 2015 the TLG Centre has been subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the *Prevent* duty.³ The TLG Centre uses the revised Prevent Guidance along with DfE advice for schools⁴ to inform procedures to ensure the requirements are met in each of the four general themes (risk assessment, working in partnership, staff training and IT policies).

³ Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 ("[the revised Prevent duty guidance](#)"). Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools.

⁴ [The Prevent duty – departmental advice for schools and childcare providers, June 2015](#)

3.2 Groups of students particularly at risk

Most students attending TLG can be described as vulnerable, due to a range of factors that have contributed to, or come about as a result of them struggling in mainstream schools. Because of this, staff must be particularly vigilant in recognising and responding to potential indicators of abuse in all students. Staff should exercise professional curiosity whenever there are changes in behaviour or circumstances come to light that, although innocent in appearance, could be indicators of safeguarding issues below the surface. All concerns, however small or unsubstantiated, should be logged on Lighthouse under 'Concerns'.

Children with special educational needs and disabilities

In addition, our school understands that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability, without further exploration.
- Children with SEND and disabilities can be disproportionately impacted by things like bullying, without outwardly showing signs.
- Communication barriers and difficulties in overcoming these barriers.

Children requiring mental health support

The TLG Centre has an important role to play in supporting the mental health and wellbeing of their pupils. 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. Trauma informed training is in place to help all TLG staff recognise and respond to children in need of extra mental health support, including referring to external agencies.

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Referring schools and local authorities should always share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare and support.

Looked After children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. It is vital that staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Children missing from education

TLG recognises that a child missing education is a potential indicator of abuse or neglect and will follow the school procedures for unauthorised absence and for children missing education including reporting the absence to the referring school or agency. TLG's Absconders and children missing from education, home or care Policy gives further details of the procedures and duties for dealing with this issue.

4. Child Protection procedures

All staff members should be aware of the signs of abuse and neglect. Knowing what to look for is vital to the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation, so that staff are able to identify cases of children who may be in need of help or protection.

Staff at TLG deliberately take time to observe and get to know our students. We develop trust and build relationships creating an environment where students know they can talk to staff about any concerns they have. Posters around the Centre reinforce this. In addition to speaking to staff, students can report any concerns through the school website. Staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.

When worrying changes are observed in a child's behaviour, physical condition or appearance; or a child tells a member of staff about possible abuse, staff will:

- Initially talk to the child/young person about what they are observing.
- Ask open questions, for example, "I've noticed that you don't appear yourself today - is everything okay?", but never use leading questions.
- Listen carefully to what the young person has to say and take it seriously.
- Never investigate or take sole responsibility for a situation where a child/young person makes a disclosure.
- Always explain to children and young people that any information they have given will be handled with an appropriate level of confidentiality but will have to be shared with certain other professionals.
- Reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

4.1 How do I decide what action to take?

If the child is in immediate danger or risk of harm, staff MUST refer to children's social care and where appropriate, report to the police immediately.

If the child is not in immediate danger or risk of harm, staff can:

- Seek advice from the centre-based DSL, deputy, School Development Manager or TLG SG Lead.
- Refer to local thresholds for referrals and early help, provided by the local authority. Thresholds from Bolton Safeguarding Partnership can be found on the [Bolton Safeguarding Children Partnership website](#).
- Contact the local Service Desk to obtain advice.

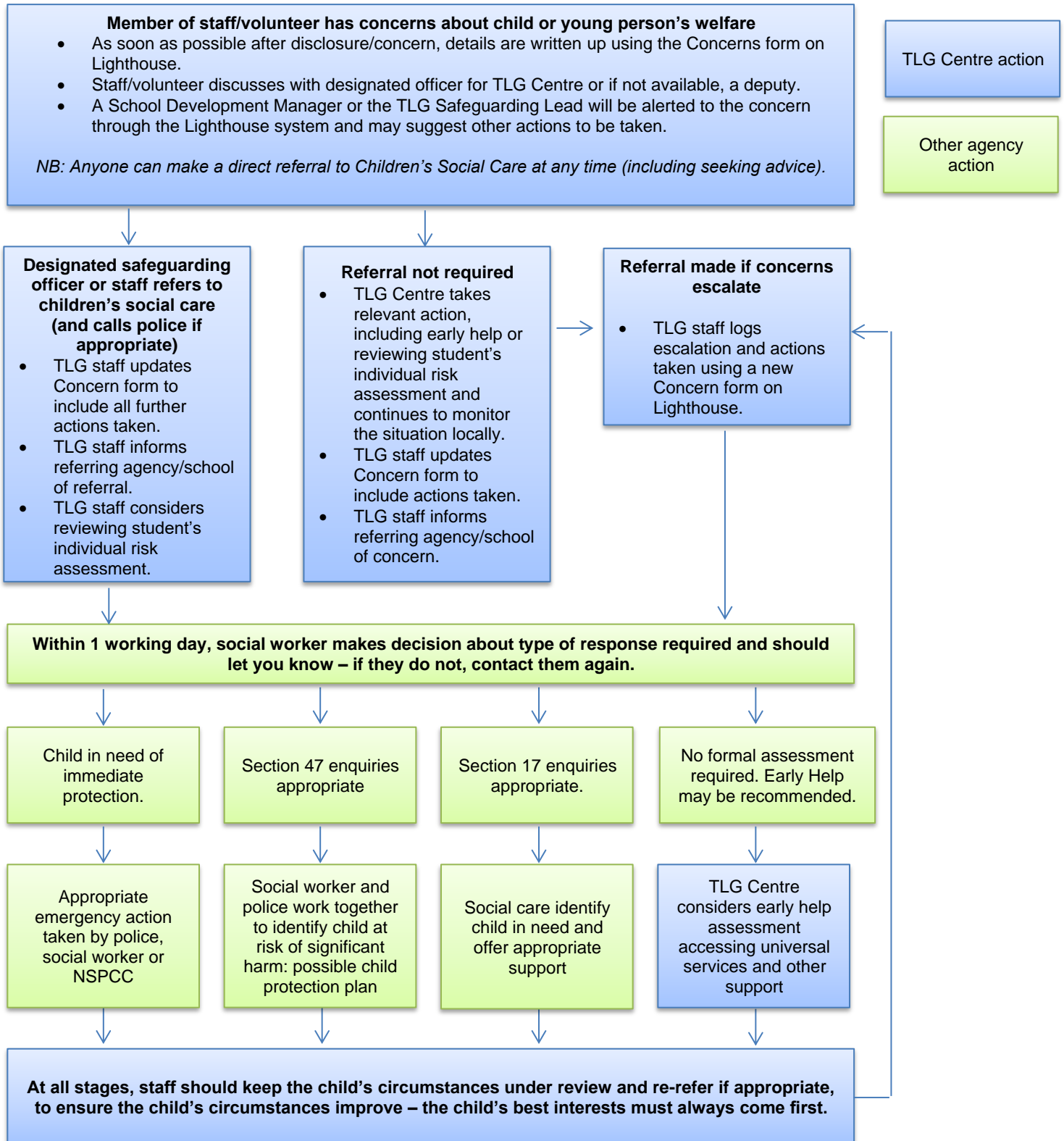
Local procedures for making referrals to Children's Social Care for children living in Bolton can be found on the [Bolton Safeguarding Children Partnership website](#).

Local procedures for making referrals to Children's Social Care for children living in the Greater Manchester area can also be found on the [Bolton Safeguarding Children Partnership website](#).

Schools should provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

All relevant contact details are in Appendix A of this policy.

4.2 Flowchart for child protection concerns



4.3 The child's wishes

Where there is a safeguarding concern, staff should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Pupils must be given opportunities to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at their heart.

4.4 Early Help

Any child may benefit from early help, but TLG staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day.

If early help is appropriate the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. The case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.

4.5 Multi-agency working

TLG staff have a pivotal role to play in multi-agency safeguarding arrangements. Staff should contribute fully to multi-agency working in line with statutory guidance Working Together to Safeguard Children⁵. All staff should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

⁵ <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area in the local authority area) will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. The Proprietor, Management Committee, Head Teacher and DSLs should make themselves aware of and follow local arrangements.

4.6 Escalating when information or action is not forthcoming

Staff should follow up with Children's Social Care if they do not inform you within one working day, of the course of action they are taking. If you are not satisfied with this decision, or if after a referral the child's situation does not appear to be improving, the DSL (or the person that made the referral) should follow local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves. This action should be logged on the Concern form on Lighthouse.

TLG's Safeguarding Lead can support and advise with this process.

5. Recording, reporting and managing confidential information

5.1 Lighthouse Concerns Form

Completing the form

The person who receives an allegation or disclosure, or has a concern, should complete a **Concern** form on **Lighthouse**. All concerns, discussions, decisions, follow-up, actions and outcomes, including the reasons for those decisions and actions taken should be recorded in full, including full names, dates, times and locations. If in doubt about recording requirements staff should discuss with the designated safeguarding lead.

If a referral has been made to Children's Social Care, staff should note down the name and contact number of the Social Worker receiving the referral. Copies of the referral documents should be uploaded to the Concern form.

Any other or subsequent documents relating to the concern should also be uploaded in order that all documentation relating to that concern are kept securely in the same place.

If third party organisations / agencies / partners, including the referring school agree to certain actions, these should be noted on the Concerns form in order that TLG staff can check these actions have been completed and record and consider the outcome.

Review dates

If the issue is un-resolved, or there are incomplete actions relating to a concern, a review date should be set which reflects the shortest timescale within which progress against the case/actions can be further evaluated and recorded or updated. Lighthouse will send a reminder email to all staff concerned when a review is due and staff are expected to review all cases in line with these dates.

Updating the Concern form

Staff should update the initial concern form to reflect all further information that comes to light or actions taken in relation to the initial concern raised. When viewing a concern, Lighthouse displays the most recent version of what has been logged, whilst maintaining a version history of all previous entries made, so as not to overwrite any information that later may be required in an investigation or in court.

Notifications to DSL and senior leadership

Whenever a form is first submitted or updated, Lighthouse will send an automated email notification to all those with DSL responsibility for the Centre where the concern has been raised, including the team of School Development Managers and the TLG Safeguarding Lead. This allows senior leaders to quickly assess whether the actions taken by Centre staff and the Centre-based DSL are sufficient and to provide further advice and guidance and support where needed.

Logging subsequent concerns

Once a concern has been marked as 'resolved', if a subsequent concern with either a similar or different nature comes to light, a new Concern form should be used to log that concern. Lighthouse will display all concerns relating to one child alongside each other, in order that staff can easily spot and respond to any emerging patterns.

5.2 Information sharing and reporting

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

Staff should follow local processes and use local referral forms when making referrals or reports to Children's services, Channel, the Police etc..

Staff should have due regard to relevant data protection principles for sharing and withholding personal information as set out in the Data Protection Act 2018 and GDPR. This includes knowing what information they can store and share when they are 'safeguarding children and individuals at risk', including 'special category personal data' and when personal data should be withheld where the 'serious harm test' is met. All staff have school –specific GDPR training and should refer any questions to the TLG Data Protection Officer.

Transfer of child protection records to school

When a student returns to their referring school or moves onto another school or provision, the DSL is responsible for ensuring that their 'Concerns' records are transferred securely to the DSL at the new establishment. This can be done using the PDF function on the Concerns tab. If sent electronically, the PDF must be sent to a named individual's school email address and not to a generic mailbox (e.g. info@schoolname) with password protection on the attachment. Encrypted emails can be sent using the confidential@tlg.org.uk email address (instructions on SharePoint). Alternatively, the records can be printed, marked as confidential, securely delivered and signed for by the DSL at the returning school.

5.3 Managing confidentiality

TLG is committed to managing confidential information safely. TLG recognises that all children and young people have a right to confidentiality. Specific information relating to safeguarding concerns will only be shared with other staff on a 'need to know' basis. Unless specified by the staff recording the concern (e.g. in the case of an allegation being made against a member of staff to whom records would normally be visible to), the details of any Concerns forms on Lighthouse are only visible to the member of staff who recorded the concern, DSLs within the Centre and in the Management Committee, and TLG's Safeguarding Lead. Any remaining additional paper-based records relating to Child Protection will be stored in a locked cabinet, and marked as confidential.

Retention of child protection information

Child protection files (i.e. Concerns logs and any additional/separate paper-based information) should be kept until the pupil is 25 years old. For children who are Looked After, information should be kept until they are 75 years old.

Within this time, information relating to concerns must not be removed from the Lighthouse system, in order that it could be provided if a case were to go to an inquiry. If/when the Lighthouse system is replaced, all safeguarding records must be extracted for secure archiving or transferred to a new system.

Organisations have a duty to keep any records that could be needed by an official inquiry. Centres should seek legal advice about how long to retain such records. If there are legal reasons why information needs to be kept for longer, files must be clearly marked with the reasons for the extension period.

6. Safeguarding concerns or allegations of abuse made against staff

Full details can be found in the TLG policy – Safeguarding: Dealing with concerns and allegations against staff.

These procedures apply to all staff, whether teaching, administrative, management or support, as well as to sessional or supply staff and volunteers. It also applies to Proprietors and management committee members who may not be employees of the school. The word “staff” is used for ease of description.

These procedures should be used in respect of all cases where there is a safeguarding concern or in which it is alleged that a member of staff has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related 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.

These procedures relate to members of staff who are currently working at TLG regardless of whether the TLG Centre is where the alleged abuse took place. Allegations against former staff should be referred to the police.

Staff are encouraged to share with their manager or school development manager any low-level concerns they have about another adult working in the Centre. This includes where the individual’s conduct:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO (as set out in Part 6 of the Child Protection Policy).

This will allow managers to address any unprofessional behaviour and support the individual to correct it at an early stage.

Staff and volunteers can also raise concerns about poor or unsafe practice and potential failures in the school’s safeguarding regime. These concerns should be raised in the first instance with the Head Teacher or if appropriate, the School Development Manager. TLG’s Whistleblowing Policy outlines the procedures that should take place where such concerns exist.

6.1 Confidentiality

It is extremely important that when an allegation is made, the TLG Centre makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.⁶

6.2 Receiving an allegation from a Child

⁶ The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school or college (where that identification would identify the teacher as the subject of the allegation).

A member of staff who receives an allegation about another member of staff from a child should follow the guidelines in section 4. In addition, the following should also take place:

- The worker must ensure that the child is safe and away from the person against whom the allegation is made.
- The allegation is then to be reported immediately to the designated officer/named person (Head Teacher) unless this is the person against whom the allegation is made, in which case the report should be made to the School Development Manager who is part of the Management Committee for the Centre. From here, this person shall be referred to as the 'case manager'.
- The case manager will immediately contact the Local Authority Designated Officer (LADO) who will advise and agree a course of action from there. Outside of working hours the Emergency Duty Team can give advice. In the event of an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may want to involve the police.
- Using the Concerns form on Lighthouse, the individual who first received/witnessed the concern should make a full written record of what was seen, heard and/or told as soon as possible after observing the incident/receiving the report. It is important that the report is an accurate description. The case manager can support the worker during this process but must not complete the report for the worker. This report must be made available on request from either the police and/or social care.

From here, please refer to the full details of the procedure given in the TLG policy – Safeguarding: Dealing with allegations against staff.

7. Training

7.1 Induction

All new staff will undertake a **safeguarding induction**, during which they will carry out online initial safeguarding training (e.g. Level 2 Safeguarding Young People or Safeguarding – the Designated Person, Online Safety and Prevent) and will take part in face-to-face training that sets out the specific policies, procedures, safeguarding personnel and recording systems in place at their TLG Centre (e.g. Safeguarding at TLG).

All new staff will be provided with, and asked to read a copy of the **TLG Safeguarding Handbook**, which contains DfE statutory guidance the key TLG safeguarding policies (KCSIE – Part 1 or Annex A; CP Policy; Staff Code of Conduct; E-Safety Policy and Acceptable Use Agreements; Behaviour Policy; Absconders and Children missing from Education, Home or Care; Whistleblowing Policy.)

7.2 Ongoing training

Designated Safeguarding Leads will **update their DSL training every two years** and in addition, will carry out **regular training and safeguarding updates** (e.g. multi-agency, local board, participation in local events/meetings, e-learning, e-bulletins, web-research, TLG webinars) covering known national and local specific safeguarding issues and procedures (including Early Help) to provide them with the relevant skills and knowledge to fulfil their role and safeguard children effectively. As an absolute minimum, these updates should take place annually, but we would expect them to happen much more frequently, as required.

All other staff will refresh their **basic safeguarding training every 3 years** and in addition, will carry out **regular training and safeguarding updates** (e.g. multi-agency, local board, participation in local events/meetings, e-learning, e-bulletins, web-research, TLG webinars) covering known national and local specific safeguarding issues and procedures (including Early Help) to provide them with the relevant skills and knowledge to safeguard children effectively. As an absolute minimum, these updates should take place annually, but we would expect them to happen much more frequently, as required.

Mandatory safeguarding updates for all staff, including online safety, are built into TLG's annual training cycles and programmes.

7.3 Training records

Staff must record all training undertaken, including regular safeguarding updates, on Harbour and upload certificates (where available) to their online HR file.

8. Safeguarding in the curriculum

Safeguarding issues, including online safety, are taught and discussed frequently at TLG both through structured PSHCE curriculum and 'Thought for the Day' sessions and informal conversations that take place on a daily basis. Staff are responsive to situations and issues students are facing or are at risk from and are also sensitive to students' individual and personal contexts in their approach.

9. Links to other Safeguarding Policies

TLG has a suite of Safeguarding Policies, covering a range of aspects of safeguarding. These are as follows:

Selection and Recruitment Policy: Sets out arrangements for safe recruitment practices and vetting of staff, management and proprietors.

Volunteer Recruitment Flowchart: Provides Head Teachers with the process they should follow when recruiting volunteers to ensure they are recruited safely and vetted appropriately.

Safeguarding – Staff Code of Conduct: Provides guidance for staff and sets boundaries on maintaining appropriate relationships with pupils.

E-Safety Policy and Acceptable Use Agreements: Outlines key areas of risk in online safety and sets out arrangements for managing and maintaining safe use of ICT including the Internet on mobile and smart technology, both in and out of the Centre.

Absconders and children missing from education or home: Sets out procedures and duties for staff to follow when pupils go missing from the TLG Centre, or are known to be missing from school, home or care.

Sexual violence and sexual harassment between peers Policy: Sets out principles and processes for dealing with reports of sexual violence or harassment between pupils.

Relationships and Sex Education Policy: Sets out the principles and approaches TLG uses in delivering RSE.

Visitors Procedure and Agreement – Provides staff with a safe process for admitting visitors into the TLG Centre.

Dealing with allegations against staff: Sets out the procedures and principles to follow in the event of an allegation against a colleague.

Whistleblowing Policy: Sets out the mechanisms through which staff can report illegal or improper conduct by a colleague.

Safeguarding Children Policy Summary: Provides parents with a summary of key safeguarding information.

This Child Protection Policy is also closely linked to:

Behaviour Policy: Sets out our principles for behaviour management and sanctions, including dealing with incidents of peer on peer abuse.

Anti-Bullying Policy: Sets out our approach to bullying.

10. Disseminating/reviewing policies and procedures

The centre-based DSL will report to the Management Committee each term, setting out how the school has discharged its duties with regards to safeguarding children. The Child Protection Policy and other safeguarding policies will be reviewed annually. Any changes/amendments will be shared with staff and where significant changes appear, these must be relayed to parents/carers. Where possible, parents/carers and young people will be involved in the review process.

All staff have an opportunity to contribute to and shape safeguarding arrangements and child protection policy through regular staff meetings and training. The Person with Lead Responsibility is responsible for reporting deficiencies in procedure or policy identified by the Local Safeguarding Partners (or others) to the Management Committee at the earliest opportunity.

Where an allegation has been made against a member of staff, TLG's safeguarding lead person should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of TLG's procedures and/or policies and/or which should be drawn to the attention of the Local Safeguarding Partners.

Appendix A

Details of staff with particular responsibility for child protection and local contacts

TLG Centre:	Bolton
Centre Address:	Concorde House, 2, Frederick Street, Farnworth, Bolton. BL4 9AL.

Centre-based Designated Safeguarding Lead (DSL)

Name:	Gareth Crossley
Contact details:	01204 770797 / 07726 491538

Deputy Designated Safeguarding Lead (DSL)

Name:	Emily Hemsley
Contact details:	01204 770797

School Development Manager (DSL Trained)

Name:	Helen Laws
Contact details:	07852 435 128

Senior Safeguarding Lead across TLG

Name:	Helen Laws
Contact details:	07852 435 128

To report a child protection concern to children's social care

Name of council:	Bolton Council
Ofsted outcome:	Good
Contact number during office hours:	Bolton's Multi-agency Screening and Safeguarding Service (MASSS) 01204 331500
Contact number out of office hours (emergency duty team):	01204 337777

Local Authority Designated Officer LADO (for reporting allegations made against staff

Contact details:	Colin Jones 01204 337474 colin.jones@bolton.gov.uk
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Local Channel Scheme contact details

To make a referral, contact:	The Channel Team within GMP North West counter-Terrorism Unit Telephone: 0161 856 6362. Email: channel.project@gmp.police.uk
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Other local contacts

Name / organisation / agency:	Contact details:
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Police Public Protection Investigation Unit	0161 856 7949
Coram Children's Legal Service	08088 020 008 (8am - 8pm)
Bolton Safeguarding Children Partnership	http://boltonsafeguardingchildren.org.uk/ Westhoughton Town Hall Market St Westhoughton Bolton BL5 3AW Phone: 01204 337479 Integrated Working Team on 01204 331394/1392. Email: boltonsafeguardingchildren@bolton.gov.uk

The NSPCC Child Protection Helpline is a free 24-hour service that provides counselling, information and advice to anyone concerned about a child at risk of abuse. Telephone: 0808 800 5000 Email: help@nspcc.org.uk.

If you have reason to believe that a child/young person is at immediate risk of harm, contact the Police on 999.