



# **Safeguarding Policy**

## **2021/22**

### **Keeping you safe**

## Policy Statement

Petty Pool is dedicated to providing a safe and secure environment for all students and clients who access the site and expects all staff, volunteers and stakeholders to demonstrate a parity of commitment to Safeguarding.

At Petty Pool we believe that safeguarding and promoting the welfare of children and young people is everyone's responsibility and that through our child and student centred approach we will consider, at all times, what is in the best interests of the child and young person.

Our charity will establish and maintain an ethos where students and visiting children and young people feel secure, are encouraged to talk, are listened to and are safe. Students or visiting children and young people will be able to talk freely to any member of staff if they are worried or concerned about something.

We believe that everyone who comes into contact with children, young people and their families has a role to play in safeguarding. We recognise that staff at Petty Pool play a particularly important role as they are in a position to identify concerns early and provide help for children and young people to prevent concerns from escalating. We are committed to identifying where children and young people may benefit from early help and working in partnership with other professionals to undertake an early help assessment.

All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child or young person and how to record and report this information. We will not make promises to any child or young person and we will not keep secrets. Every student will know what the adult will have to do with any information they have chosen to disclose.

Throughout our curriculum we will provide activities and opportunities for students to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage our students to develop essential life skills.

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (revised 2015, Sept 2016, December 2020).

It is the responsibility of every member of staff, volunteer and regular visitor to our organisation to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the students and visitors to our organisation. This includes the responsibility to provide a safe environment in which children and young people can learn and achieve.

Lachlan Nisbet  
Chair

## **Purpose of document**

Petty Pool recognises that all children, young people and vulnerable adults have the right to freedom from abuse and radicalisation and to be in an environment where safety, praise, recognition and opportunity for taking responsibility are available.

This policy outlines Petty Pools commitment to safeguarding and to provide clear guidance to dealing with all issues regarding working with children and vulnerable adults

- To provide fair and equal opportunity for all students and clients in a safe and secure environment
- To prevent abuse from occurring within the organisation
- To ensure consistency in the handling of concerns, allegations and disclosures of abuse
- To provide guidance for Senior Managers in the effective investigation and/or reporting of incidents
- To assist staff in supporting students and reporting matters relating to Safeguarding
- To help recognise and identify cases of abuse happening externally
- To provide guidance with regard to staff recruitment, handling and reporting of incidents
- To ensure staff are suitably trained with the knowledge and understanding required of them professionally with regard to Adult Protection and how to implement the associated procedures in place within Petty Pool
- To ensure effective partnerships with other organisations to Safeguard vulnerable adults and children
- To monitor and evaluate practice
- To assist Petty Pool in contributing towards Inter-agency Child/Adult Protection Investigations and Risk Management Plans
- To encourage people to report concerns regarding any form of abuse
- To promote and achieve a safer environment for all

## **Who this policy applies to**

This Policy applies to ALL individuals associated with the Trust, all of whom have a responsibility for the protection of Vulnerable Adults and Children.

- Board of Trustees of Petty Pool
- Chief Executive Officer of Petty Pool
- The Senior Management Team of Petty Pool
- All tutors and non-teaching staff (including those who are supply, volunteers and freelance)
- All Students and Clients who access any provision offered by the Trust
- All professionals who work with Students and Clients

## **Summary of changes from previous policy (Sept 2020)**

To reflect new statutory guidance Keeping Children Safe in Education

## Section 1 Responsibilities

The Chief Executive and the Board of Trustees have overall responsibility for the implementation of this policy will ensure staff are fully aware of the requirements of this policy and to ensure all incidents are reported to the Designated Safeguarding Leads and recorded and monitored correctly. The Board of Trustees have also nominated a designated safeguarding link.

The Chief Executive, DSL and Deputy DSL are responsible for Overseeing the referral of cases of suspected abuse/radicalisation or allegations to the relevant City/County Council's Department of Children and Young People's Services, or other agencies (such as the police, Channel) as appropriate.

The Chief Executive and DSL is responsible for liaison with various professional bodies and outside agencies with regard to student safety and protection. The Chief Executive, DSL or a member of SMT also alerts parents, carers and professionals if concerns arise during a client's time on site at Petty Pool. The DSL will deal with the protection of vulnerable people as part of their daily duties.

The DSL will also support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.

All staff, volunteers, trustees, contractors and visitors must follow this policy and seek guidance where required from the named safeguarding leads and report on any safeguarding concerns raised.

All staff must be aware of Petty Pool systems which support safeguarding, and these will be outlined in induction with regular updates throughout the year, these include:

- The staff code of conduct
- Students behaviour code and disciplinary code
- The safeguarding response to students missing from education
- The role and identity of the safeguarding leads

All staff must be aware of the process for making referrals to the local authority and the role they may need to play following a referral. Staff should also be aware that if a young person is in immediate danger then the police should be called (see flowchart in appendices).

All staff must communicate the main principles of this policy and how to raise any concerns that they may have during their induction and re-enforce regularly through tutorials. Course tutors and Instructors are frequently the first line of contact for a student/client who wishes to report an incident. It is the duty of the tutor or instructor to inform the student/client as far as possible of the appropriate procedures, to report the matter to their line manager and to support the student/client to the best of their ability.

Students/Clients: Students wishing to formally report an incident will be given support to do so in an appropriate way. They may wish to inform an Advocate, parent or friend, or a professional body and invite them to Petty Pool for support.

### Named protection officers

Petty Pool has designated named people for safeguarding within the organisation and have the appropriate knowledge to advise on the response to safeguarding concerns.

#### The designated safeguarding lead is:

- Sally Garratt Chief Executive
- Wendy Bowyer Director of Education

### **The deputy safeguarding officer:**

- Emma Hallett Director of Curriculum and Planning
- Jim Davy Outdoor Centre Manager

### **Safeguarding champions**

- Nikki Hughes Learner Mentor
- Gemma Garvey Tutor
- Karen Weedon Job Coach

The board safeguarding link is Elly Lees Jones

## **Roles and responsibilities of Designated Safeguarding Officers**

### Protection:

- Chair the Safeguarding panel to review safeguarding concerns raised and take action, monitor ongoing cases and ensure the records are up to date and the team know the actions in place to support the individual
- Refer cases of alleged or suspected abuse to the relevant investigating authorities
- Liaise with case manager, designated officer at the local authority for safeguarding concerns
- Act as a source of support, advice and expertise within Petty Pool when deciding whether to make a referral though liaison with appropriate agencies including when students need extra mental health support
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals to the Local Authority/Safeguarding Partners and or Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the DBS
- Refer cases where a crime may have been committed to the police/LADO
- Liaise with College team to inform of any issues and on-going investigations and ensure there is always a Deputy DSL or Safeguarding champion available and able to cover this role

### Work with others

- Liaise with partner's, or care manager at the local authority
- Liaise with staff including staff at Cheshire College

### Raising Awareness:

- Ensure safeguarding and vulnerable adult protection is an agenda item at all appropriate meetings
- Ensure all are aware of Petty Pool's safeguarding children and adults protection policy and procedures and they are consulted about safety at Petty Pool
- Ensure there is communication with those who work in partnership with Petty Pool including contractors, suppliers, placement providers and others so they can support Petty Pool's safeguarding policy approach.
- Ensure the policy is reviewed annually and appropriately updated

### Training

- To undertake all training as recommended including updating skills and knowledge of local procedures, safer recruitment and ensure Safeguarding champions are all up to date
- Keep accurate secure written records of concerns, ongoing monitoring and referrals
- To ensure that all the relevant training is provided to staff, volunteers and students on a annual basis.
- Understand issues and lead and co-ordinate charities response to Prevent duty
- Understand issues and lead and co-ordinate charities response to online safety
- Recognise additional risks that SEND students face
- Encourage a culture of listening to students and working in a young person centred way

All staff are responsible for ensuring the welfare, progress and safeguarding of any students who are looked after or needing additional support around mental health and liaising with the relevant social workers of this student.

## Section 2 Definitions

**Safeguarding** looks at keeping children, young people and vulnerable adults safe from a much wider range of potential harm and delivers preventative action not just reaction.

Safeguarding and promoting the welfare of children/young people is defined for the purpose of the guidance as

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

All staff must have an awareness of safeguarding issues that can put children at risk of harm and be aware that safeguarding incidents and/or behaviours can be associated with factors outside college. All staff should consider whether young people are at risk of abuse or exploitation in situations outside their families. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting put children in danger.

**Child/Adult protection** looks at recognising abuse and neglect and acting on it, it is an important aspect of safeguarding

**Abuse** is any behaviour towards a person that deliberately or unknowingly causes harm, endangers life or violates an individual's human and civil rights by any other person or persons. There are four recognised categories of abuse which are:

- Physical abuse (including over/under medication and force feeding)
- Emotional or psychological abuse
- Sexual abuse (inc. rape, incest, CSE and pornographic coercion/sexting)
- Neglect

All staff should 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. Where children have suffered abuse or neglect this can have a lasting impact and staff should be aware of the impact.

For more information, please see appendix one signs of abuse and neglect

It can also include

- Financial abuse (inc exploitation of resources and property)
- Racial
- Religious
- Honour based violence
- Forced Marriage
- Institutional
- Discrimination and oppression
- Abuse by strangers, door-step crime / victimisation
- Peer abuse
- Exploitation including child sexual exploitation or child criminal exploitation

Peer abuse could include

- Bullying (including cyber bullying)
- Physical abuse including hitting, kicking, hair pulling
- Sexual violence and sexual harm
- Sexting/sharing sexual imagery

- Initiation violence and rituals

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include but is not limited to bullying (including cyber bullying) gender based violence/sexual assaults and sexting or upskirting. The organisation has a zero tolerance approach to bullying or any form and for more information on what we do to prevent bullying, as well as how we deal with it please see our Anti Bullying Policy.

**A vulnerable adult** is defined in law as a person aged eighteen years or over who may lack capacity to make decisions because of impairment or functioning of the mind or brain (Mental Capacity Act 2005)

Circumstances where a person is considered to lack capacity might include:

- Where the person does not know they have a decision to make
- Where the person does not understand the choices available or the consequences of those choices
- Where the person cannot communicate their decision

**Other adults who have capacity** and can take informed choices to live in a situation that puts them at risk of harm should be supported after consultation with them, their community support and other relevant agencies but they may still choose to stay in the situation and live with the risk

## Legal Framework

This policy has been written in response to government statutory and non-statutory guidance specifically:

- The Children Act 2004
- Working Together to Safeguard Children (2015)
- Keeping Children Safe in Education (2015 and revisions 2018 and 2019 and 2020)
- What to do if you think a child is being abused (2015) Information sharing (2015)
- Standards as set out in Safeguarding Adults (ADSS 2005)

This policy has been formed using Cheshire West and Chester's "Safeguarding Adults Policy Statement. This document also uses guidance from the DfE Ofsted's Best Practice in safeguarding in colleges and Safeguarding Section of EIF (Sept 2019)

## Section 3 Responding to Safeguarding Concerns

If abuse is suspected i.e. there is a concern, or there is a disclosure about the welfare or safety of a child or vulnerable adult: staff or volunteers should report the allegation or concern with the Designated Safeguarding Leads (DSL) or Deputy DSLs and a referral will be made to the relevant authorities. All concerns should be recorded using the guidance to recording on Databridge in appendices..

Concerns about a child or vulnerable adult's safety will be responded to and assessed in accordance with the Local Authority Safeguarding children or Adults Board safeguarding procedures. Petty Pool should then await advice from the relevant authorities to inform next steps.

### 3.1 Procedure for dealing with complaint and allegations about staff or volunteer

Concerns about staff including supply teachers, freelancers and volunteers are treated with the same rigour as other safeguarding concerns. If a concern or allegation of abuse or inappropriate conduct is made against a member of staff or person in a position of trust, or there is suspicion regarding a member of staff or volunteers conduct with any child or young person this should be discussed with the DSL immediately. This includes where there are concerns that staff/volunteers have behaved in an unacceptable way including

- Behaved in a way that has harmed or may have harmed a child

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

Where the allegation is particularly serious or there is no doubt that an offence has been committed the police and/or local authority designated officer will be informed. A strategy for further action will then be agreed before a decision is taken to notify the staff member or volunteer.

- If the complaint or allegation is such that it is clear that investigations by police and/or enquiries by adult or children's social care are not necessary (or these bodies advise that this is the case) a decision will be made as to whether further action is still necessary, in particular if further action is required under the organisations disciplinary code. If this is the case
- The CEO will co-ordinate decisions and any actions to be taken, including any referral to social care services/police and barring service and any subsequent action by Petty Pool
  - The staff member/volunteer will be informed of the allegation and given an opportunity to respond
  - The staff member/volunteer will be suspended immediately
  - External support for the staff member/volunteer will be considered, to include accessing counselling service where appropriate and should they require it
- If the allegation is made by a young person adult services may be notified to assess whether the individual is in need of services and/or have been abused by someone else regardless of the outcome of any investigation.

Petty Pool will support staff about whom an accusation has been made, but the support will be limited by our legal obligations to pass on information to other bodies, and to support the person making the accusation, who must be allowed to continue their routine as normal without being subjected to contact with the person they have accused.

- Priority will be given to resolve the matter as soon as possible (usually within one month)
- Staff will not be automatically suspended but consideration will be taken as to the nature of the allegation and the information available
- Allegations found to be unfounded or malicious will be removed from staff records

The CEO will also make the decision as to whether CCSW should be informed and CCSW will inform the DfE and ESFA if appropriate.

### **3.2 Procedure for dealing with complaint and allegations about staff who are the DSL or Deputy DSL**

- If the allegation or suspicion concerns any of the designated safeguarding leads staff should contact the link trustee who will instigate the relevant process

The link trustee will then follow the flowchart applicable to all staff

*For further information, see Keeping Children Safe in Education*

### **3.3 Procedure for dealing with safeguarding allegation about another student**

At Petty Pool we believe all students and young people have a right to attend our provision and learn in a safe environment, free from harm by adults and other students.

In most instances the conduct of students towards each other will be covered by other aspects of policy within Petty Pool but some allegations may be of a more serious concern that may raise safeguarding concerns. These may include physical, emotional, sexual abuse or exploitation.

When an allegation is made by a student against another student it should be reported to the DSL



who will follow flowchart raising safeguarding concerns. The DSL should contact social services to discuss the case if they feel there is sufficient cause for concern. If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the student being complained about and alleged victim). Where neither social services nor the police accept the complaint an internal investigation will take place using Petty Pools usual disciplinary procedures.

On occasion some students will present a safeguarding risk to other students and visitors. These students will have an individual risk management plan to ensure other students are kept safe and they themselves are not laid open to malicious allegations. This will be developed in partnership with the relevant agencies in the local authority.

### **3.4 Procedure for dealing with past allegations from students**

If a student has made any accusations in the past, regarding a specific member of staff, or at a previous intuition, (even if the allegation was not upheld) under NO circumstances should any member of staff put themselves in a 1-1 situation with this student or vulnerable adult.

The DSL will ensure that the relevant risk assessments and control measures are developed and introduced before a young person is allowed to participate in activities at Petty Pool.

### **3.5 Procedure for raising concern that a child or young person is involved in Child Sexual Exploitation and Child Criminal Exploitation**

CSE and CCE is an abuse of power where an individual or group takes advantage of an imbalance of 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 factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some case the abuse will be in exchange for something the victim needs or wants and will be to the financial or other advantage (i.e. status) of the perpetrator or facilitator,

This abuse can be perpetrated by groups or individuals, females, children or adults. It can take place in person and online . Victims can be exploited even when activity seems consensual. CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, gifts, money or even affection) as a result of engaging in sexual or criminal activities.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

Children and young people under the age of sixteen cannot, by law, consent to sexual intercourse and anyone engaging in sexual activity with a child under the age of 16 is committing an offence. Whilst the age of consent is sixteen, it is illegal for those under 18 to be paid for sexual services or in kind.

Concern that a child, young person, or vulnerable adult may be involved in sexual or criminal exploitation or at risk of being drawn into it should always initiate action and staff should report the concern to the DSL

### **3.6 Procedure for dealing with when consensual sex has taken place where one or both young people are students at the college and above consensual age**

- Follow the process outlined in the reporting safeguarding concerns
- It is important to ensure there has been no exploitation or coercion involved, Where the relationship is clearly mutual and consensual with both individuals it may be appropriate to encourage the young person to inform their parents/guardian or involve other agencies to explore sexual health issues

### **3.7 What to do if you are concerned about Female Genital Mutilation (FGM)**

FGM is a non-medical, partial or total removal of the external female genital organs. The procedures are typically carried out on young girls. FGM is illegal in the UK and particularly affects girls and women in Africa. From 31<sup>st</sup> October 2015 a new mandatory reporting duty for FGM came into force – this requires professionals to report known cases of FGM in under 18 year olds to the police.

Risk factors for FGM include

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PHSE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special procedure' to become a woman

If you are concerned that a student or young woman is at risk from FGM you should report the concern to the DSL following the process outlined in appendix 2 reporting safeguarding concerns

### **3.8 What to do if you are concerned about private fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18 is disabled) by someone other than a parent or close relative (close relative defined as grandparent, brother, sister, uncle or aunt including half siblings and step parents but not great aunts/uncles or great grandparents or cousins) in their own home in the intention it could last for more 28 days or more.

Each party involved in a private fostering arrangement has a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start.

Professionals also have a duty to inform the local authority if they are aware of or suspect that a child is subject to a private fostering arrangement.

If you are concerned that a student at risk is subject to a private fostering arrangement you should report the concern to the DSL following the process outlined in appendix 2 reporting safeguarding concerns.

### **3.9 What to do if you are concerned with sexting**

Sexting is defined as youth produced sexual imagery i.e young people sharing images/videos they have created.

If staff are concerned or aware of students sharing any sexual imagery then they should report this immediately to the DSL. They will then hold an initial review meeting and interview the young people involved.

The DSL will make the decision if parents should be informed at the earliest stage unless there is concern that their involvement could lead to a young person being at risk of harm.

The DSL will make the decision if this is a safeguarding issue which can be dealt with internally or if an appropriate referral to the relevant authorities is needed.

An immediate referral to police or social care should be made if

- The incident involves an adult
- There is reason to believe the young person has been co-erced, blackmailed or groomed or if there are concerns about their capacity to consent
- The imagery involved sexual acts with anyone is under 13
- There is any concern that someone is harmed

### **3.10 Responding to reports of child on child sexual violence and sexual harassment**

The DSL will advise on the initial response taking into consideration the wider safeguarding picture, the wishes of the victim, nature of alleged incident, the ages of students involved and power in balance i.e. capacity, the pattern and nature of the incident and if there are ongoing risks.

Immediate consideration will be given as to how best to support the students involved. Petty Pool recognises that students should have an appropriate level of awareness around personal space and that sexual violence and harassment is not tolerated.

Following a report of sexual violence, harassment or inappropriate behaviour (including allegations from previous institutions) the Director of Education will make an initial risk and needs assessment consider the victim and their protection, the alleged perpetrator and other students, staff and visitors to Petty Pool. This will be discussed with CEO to agree appropriate course of action.

### **3.11 What to do if you are concerned about a student missing from education**

Petty Pool students have good attendance and any absences are followed up immediately with a phone call to the student's house and the reason is noted. Petty Pool will keep up to three contact details per student including home/land line, immediate carer and another emergency contact. If no contact is made within three days, then the local authority will be informed.

### **3.12 What to do you if you are concerned about the management of safeguarding in Petty Pool.**

Petty Pool recognises that if staff or volunteers, or other stakeholders, feel that a referral is necessary, there is an incident regarding the Chief Executive or the Director of Student Services, or that there is dangerous or illegal activity or a widespread systematic failure in the provision or management of services then people can raise concerns

- directly with the local multi agency safeguarding partnership Cheshire West or Cheshire East – see section 13 for details
- directly with our prime contract CCSW – contact Chris Baggs
- via the Independent whistleblowing charity Public Concern at Work on 020 7404 6609
- via the NSPCC website or whistleblowing helpline 0800 028 0285

For more information, see the organisation's whistleblowing policy and whistleblowing to OFSTED about safeguarding in local authority children's services.

## **Section 4 Safeguarding measures adopted by Petty Pool:**

The management of Petty Pool realise that there are several areas of particular risk to ensure the safeguarding of students, young people and staff. Special care should be given during these activities and additional guidelines and risk considerations have been developed for each of these activities. These include

- Physical intervention including giving instruction on the Outdoor Education centre, where a student may need particular support or to safeguard from harm i.e. if they have mobility issues
- Personal care especially for students at the college
- Changing for outdoor activity, sports and swimming
- Overnight stays in our residential centre and for student off site residentials

More guidance is given in the code of conduct for staff. If staff have any questions, or concerns, they should be discussed with the DSL.

Petty Pool adopts a range of other safeguarding measures to ensure the safety of all. These include

- Weekly staff meetings include a section on student issues – which are then discussed in the weekly SMT meetings
- All staff, including voluntary staff must have been checked by DBS/ barred list check prior to working with Clients
- All staff participate in a full induction
- Voluntary staff should not be left in charge of clients or give support in a 1-1 situation (i.e. on their own)
- Guidelines for dealing with epileptic seizures are displayed on every wall and in vehicles
- Medical Records must be completed for all Students and Outdoor Centre residential clients, prior to attending the site
- First Aiders are on site with posters showing who they are displayed
- DSL are available for staff to raise concerns out of hours and during the school holidays
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- Driving Licence Check is undertaken annually and any staff transporting students must undertake an independent assessment
- Reference Checks are undertaken for all paid staff
- Qualifications of all paid staff are checked and retained on file
- Work placements are risk assessed and work based learning providers are made aware of their common law duty of care to take steps to ensure the safety of the vulnerable person at all times
- Young people are given information about safeguarding during their induction and information displayed on walls on what to do if they have a concern
- The student survey and learner forum asks students if they feel safe during their studies at Petty Pool and SMT act upon any concerns as part of self assessment process
- All staff, volunteers, contractors and visitors sign into the buildings. Lanyards are worn with different colours to differentiate
- External contractors are suitably checked and supervised
- Protection online including use of appropriate filters and monitoring systems, awareness raising for students and close supervision online.
- Our wider curriculum including our tutorials and Preparation for Adulthood includes relevant and appropriate support and information on relationships

## Section 5 Preventing violent extremism

In respect of safeguarding individuals from radicalisation, Petty Pool works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Radicalisation is

*'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas.'*

The PREVENT strategy has three clear objectives:

- Terrorist ideas should be identified and challenged
- Vulnerable people should be supported and protected from becoming terrorists or supporting terrorism
- Communities, institutions and the Governments should all work together to tackle the problem of extremism

Petty Pool have an annual Self-Assessment Process that enables us to identify, assess and then develop our Safeguarding procedures around the four key areas in relation to the PREVENT agenda. These key areas include:

- Leadership and accountability structures
- Training for staff, SMT and Trustees
- Reporting and referral routes (including Channel)
- Broad and balanced curriculum that helps protect children against extremism
- Ensuring the site is not used by external groups which may be involved in terrorist related activity

If staff are concerned about a young person becoming involved, then they should raise the concern with the designated safeguarding leads as flowchart.

## **Section 6 Safer Recruitment**

Petty Pool will ensure that the CEO and other key personnel have completed appropriate safer recruitment training. At all times we will ensure that safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'*, DfE (2016).

At Petty Pool we will use the recruitment and selection process to deter and reject unsuitable candidates. We require evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to appointment. We will question the contents of CV if we are unclear about them, we will undertake Disclosure and Barring Service checks and use any other means of ensuring we are recruiting and selecting the most suitable people to work with our students.

Working with CCSW we will maintain a Single Central Register of all safer recruitment checks carried out in line with statutory requirements.

*For further information, see staff recruitment policy*

## **Section 7 Record keeping and Confidentiality**

Any information recorded will be kept in a separate named file, in a secure cabinet and not with the students file. These files will be the responsibility of the DSL. Child protection information will only be shared within school on the basis of 'need to know in the student's interests' and on the understanding that it remains strictly confidential.

Safeguarding information will only be kept in the file and this file will be kept up to date. Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored here.

When any information is transferred, the DSL will make contact with the relevant people and ensure that the student's file is forwarded to the receiving agency in an appropriately agreed manner. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving agency and/or evidence of recorded delivery.

Petty Pool also keeps records of what happens after a concern has been raised.

The board receives an update at each board meeting on any issues regarding safeguarding. A summary of the issues and trends is also presented at the end of the academic year. The board also receive a copy of the organisational self-assessment regarding safeguarding. See appendix 10 for outline of report.

## **Section 8 Training**

In order to protect both clients and staff The Trust provides training and implements measures, as far as is reasonably and legally possible, to protect all who attend Petty Pool. This includes annual

online Safeguarding Training and additional CPD internally run sessions and information sharing. It is also supplemented by Cheshire West & Chester Social Services and/or CCSW.

The organisation is committed to providing a thorough induction around safeguarding as well as regular updates and refresher courses, this will be provided annually via e learning and for various elements of safeguarding to be discussed as part of the CPD/training calendar. Full records of this training are kept with a register of attendance.

## **Section 9 Working with partner organisations**

Petty Pool is committed to working in partnership with Local Authorities and other agencies. Staff will contribute to any core meetings or case reviews as requested and will provide any information. Any exchange or disclosure of information must be in accordance with the Data Protection/GDPR Act 2018, the Human Rights Act 1998 and the Freedom of Information Act. However, fear of sharing information must not be a reason to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Where appropriate, Petty Pool reserves the right to defer to the Safeguarding Policies and Procedures of; Cheshire West & Chester Social Services, East Cheshire Social Services, Halton, Warrington or Wirral Social Services or those of our Franchise Partners, where it is deemed in the best interests of the individual or the case in hand. If a trigger form is sent to Social Services, the future course of the matter and eventual action will reside with them. It is most likely that they will hold an initial interview with the complainant.

## **Section 10 Additional Guidance for staff**

### **Recording information**

Details of the alleged abuse should be recorded using the concern form appendix 5 with as much information as is possible to supply

All information recorded should include:

- Factual information, for example times, dates names of people
- Whether information was gathered face to face, by telephone in person or via a third party
- Retain rough notes, letters, emails or other documents which might be supporting evidence

All referrals must be recorded in writing within 24 hours and sent to the local safeguarding team for the area that the child or vulnerable adult resides in.

The designated safeguarding leads should record also record any actions and outcomes using the incident log appendix 4

### **Good practice**

#### **Do:**

- Stay calm and take the person seriously
- Reassure the person and tell them you're glad they have told you
- Reassure the person that what has happened is not their fault-the abuser is responsible
- Be honest about you position; who you have to tell and why
- Report the information to Petty Pool Trust's designated safeguarding lead
- Keep the person fully informed about what you are doing and why
- Give the person information about confidential sources of help (if appropriate)

#### **Don't:**

- Make promises that you can't keep
- Interrogate with lots of questions
- Cast doubt on what a person tells you. Remember it has taken a lot of courage for them to tell you

- Say anything which might make the person feel responsible for the abuse, for example why they haven't told anyone before
- Communicate anger without saying it's the abuser you feel angry towards (the person may think you are angry with them)
- Contact the alleged abuser or gossip about the incident with others

## Section 11 Monitoring compliance

- The Chief Executive is responsible for ensuring that the policy and procedures are followed when needed.
- The DSL are responsible for initiating any of the procedures when required.
- All staff are responsible for notifying any related situation or circumstances that might affect the welfare of students.
- When the policy and procedure is implemented members of SMT are responsible for analysis of any implementation of the procedure and reporting any need to update procedure or process.
- Safeguarding issues will be discussed weekly at SMT and report will be provided to the board
- The policy will be reviewed each year and the organisation will undertake a safeguarding self assessment with subsequent action plan to address any concerns.

## Section 12 More information - safeguarding

[www.safeguardinginschools.co.uk](http://www.safeguardinginschools.co.uk)

<http://cheshirewestlscb.org.uk/professionals/>

<http://www.online-procedures.co.uk/pancheshire/>

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

### More information - Prevent

If you have any queries or concern around PREVENT you should raise this with your safeguarding lead(s).

### More information – FGM

NSPCC FGM helpline 08000283550

### Reporting a concern regarding the organisation

[CCSW – DSL Chris Baggs](#)

Director of Learning and Learner Services

CCSW

Dane Bank Avenue, Crewe, CW2 8AB

Tel: 01270 654654

Email: [chris.baggs@CCSW.ac.uk](mailto:chris.baggs@CCSW.ac.uk)

### Cheshire East Consultation Service

Tel: 0300 123 5012

### Cheshire West

Office hours: 01606 275 099

Out of hours: 01244 977 277

Cheshire Police: 0845 458 0000 (999 in an emergency)



## Appendix one – signs of abuse and neglect

### Signs of abuse and neglect

#### Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities including non-contact activities.

##### Key features

There are few physical signs, more likely to be emotional and behavioural factors.

- Aggression
- ♦ Withdrawn
- ♦ Self harming, including eating disorders
- ♦ Drawings of sexually explicit behaviours
- ♦ Promiscuity/ precociousness
- ♦ Inappropriate sexualised conduct
- ♦ Sexually explicit behaviour
- ♦ Reluctance to remove clothing for swimming or PE

Sexual abuse can be very difficult to recognise and reporting sexual abuse can be an extremely traumatic experience for a child. Whilst the media often focuses on 'stranger danger', studies indicate that between 80 and 90% of cases involve a known adult.

The internet has increased the risk of non-contact sexual abuse and children must be alert to these dangers when online.



#### High Risk Factors

- Families with complex needs
- Parental substance use
- Poor parental mental health
- Parents with learning difficulties
- Children with disabilities
- Families with past history of childhood abuse
- Domestic Violence

#### Physical Abuse

Physical abuse involves any action that causes physical harm to a child including fabricating the symptoms of or deliberately inducing illnesses.

##### Key features

- Bruising of various ages
- Bite marks
- Burns and scalds
- Fractures in non-mobile children
- Injuries in unusual areas or with well-defined edges
- Old injuries or scars
- Refusal to discuss injuries
- Inconsistent explanations
- Talk of punishment which seems excessive
- Arms and legs kept covered
- Reluctant to remove clothing for swimming or PE
- ♦ The parents are uninterested or undisturbed by an accident or injury

#### Neglect

Neglect is the failure to meet a child's physical and or psychological needs.

##### Key features

- ♦ Inadequate clothing for the child's size, weather or time of year
- ♦ Underweight for age
- ♦ Frequent school absences
- ♦ Poor health
- ♦ Emotionally needy
- ♦ Persistently dirty with a body odour

#### Further Information

The statutory guidance for schools is set out in the following documents:

Working Together to Safeguard Children (2015)

Keeping Children Safe in Education (2015)

What to do if you're worried a child is being abused (2015) (non-statutory)

#### Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child.

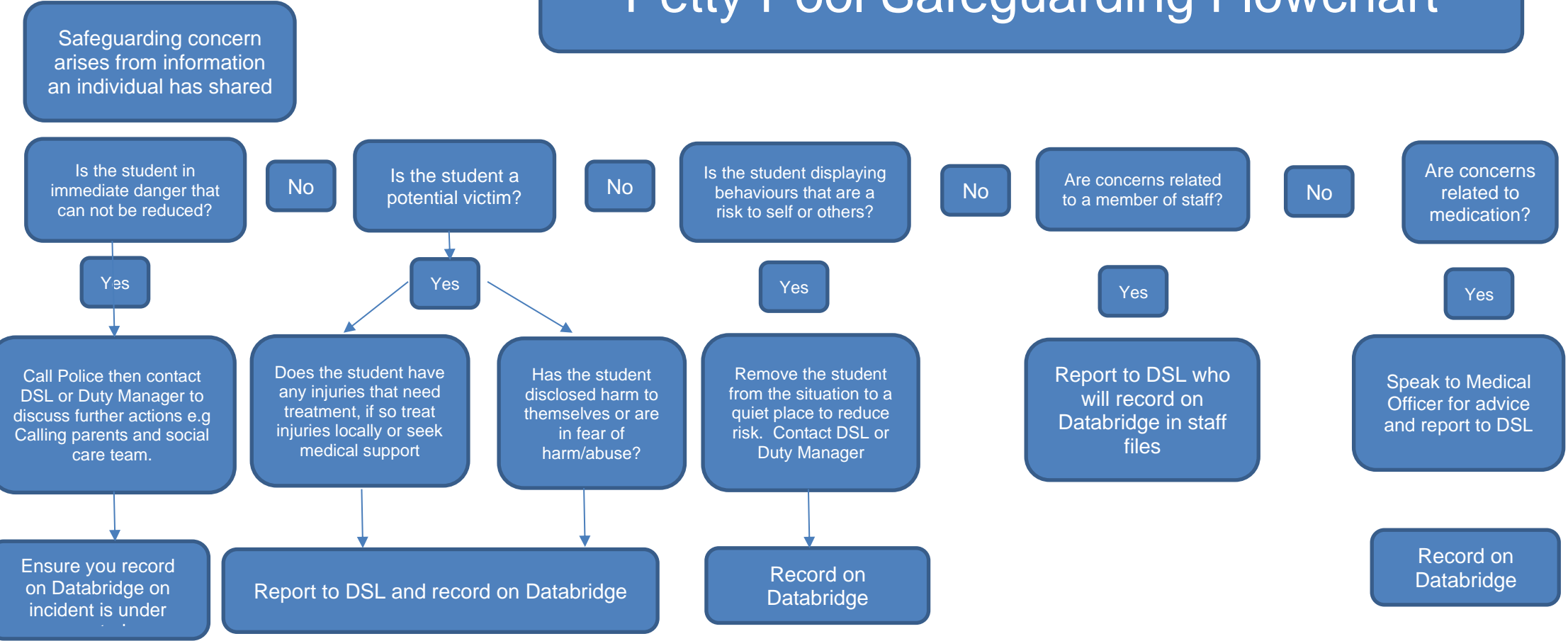
##### Key features

- ♦ Development delay.
- ♦ Abnormal attachment to parent/ carer.
- ♦ Low self-esteem.
- ♦ Lack of confidence.
- ♦ Inappropriate emotional response.



# Petty Pool Safeguarding Flowchart

## Appendix 2 Flowchart for reporting



Safeguarding weekly (or on day of reporting if needed ) panel – CEO, DSL, staff members involved and safeguarding team members  
 Review the incident and investigate if needed and discuss triggers and actions to put in place  
 Review the students current circumstances and any immediate risk with any previous incidents that may support decision making  
 Record panel discussion and next steps on Databridge and referrals made to appropriate services if needed and recorded