



SAFEGUARDING POLICY

1. Summary

Left Hook Learning (LHL) fully recognises its responsibilities for safeguarding pupils/child protection. However, KCSIE is clear: "Where a school places a pupil with an alternative provision provider, **the school continues to be responsible for the safeguarding of that pupil** and should be satisfied that the provider meets the needs of the pupil."

This policy and its procedures apply wherever staff are working with pupils. This policy is written with regard to the statutory guidance *Keeping Children Safe in Education (DfE 2021)* from the Department for Education issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015.

The aims of the policy are to:

- Ensure that there are effective procedures in place to deal with any safeguarding issues which may arise;
- Ensure that LHL develops and implements practice and procedures in accordance with this policy;
- Assist staff to work safely and responsibly and to monitor their own standards and practices;
- Set out the various responsibilities.

2. Principles of this Policy

- The welfare of the pupil is paramount;
- It is the responsibility of all adults who work with pupils to safeguard and promote the welfare of pupils;
- LHL creates a safe, supportive climate in which pupils feel that they are listened to and in which disclosure can take place.
- Pupils have a responsibility to support the safeguarding of themselves and others within the classroom. They are provided with the skills, awareness and confidence to support this responsibility.
- Staff are responsible for their own actions and behaviour and should avoid any conduct which lead any reasonable person to question their motivation and intentions;
- The same professional standards should be applied regardless of culture, gender, language, racial origin, religious belief and/or sexual identity;
- Staff should continually monitor and review their practice.

3. Staff recruitment

All applicants will be vetted. Applicants' personal details set out on the application form will be verified, and qualifications checked, and all applicants' criminal records will be checked



in accordance with Government guidance, currently contained in the guidance *Keeping Children Safe in Education* (DfE September 2019).

LHL is aware of the risks of potential radicalisation and extremist views and will take proactive measures to protect the institution and pupils from such influences.

4. Safeguarding pupils on site

LHL recognises that the safety and protection of pupils is of paramount importance. Pupils often develop a special and close relationship with staff, and view them as significant and trustworthy adults. Staff are in a unique position to notice any change in demeanour or circumstance and pupils, if they have been abused, may confide or disclose sensitive information to a teacher or other member of staff. LHL recognises that there must be a facility and process to report all abuse and neglect and provides the structure and appropriately trained personnel for disclosure to take place and be received sensitively. All concerns will be recorded and reported immediately.

Students are permitted to leave the LHL building for a short break.

5. Allegations of abuse

When a member of staff suspects that any pupil may have been subject to abuse, or a pupil has suggested that abuse has taken place either to themselves or another pupil, the allegation must be reported immediately to the Designated Safeguarding Lead (DSL) at their school.

The Designated Safeguarding Lead will deal with the allegation in accordance with agreed procedures which have been developed in line with government guidance in Safeguarding Children and Safer Recruitment in Education and are in accordance with the LSCB.

6. Allegations against staff

LHL will respond to allegations of abuse of a pupil made against members of the staff using its procedures that follow the *Keeping Children Safe in Education* guidance (DfE September 2019).

- Any allegation of staff abuse must be reported immediately.
- Where appropriate, the Principal will consult with the Designated Safeguarding Lead, and the allegation will be discussed immediately with the LADO before further action is taken. If the allegation concerns the Designated Safeguarding Lead, the Principal will immediately consult the LADO before further action is taken.
- Where an allegation or complaint is made against the Principal, the matter should be reported immediately to the Nominated Governor without first notifying the Principal. Again, the allegation will be discussed immediately with the LADO before further action is taken.



7. Allegations against pupils (including peer-on-peer abuse)

A pupil against whom an allegation of abuse has been made may be excluded for a fixed period of time from LHL during the investigation.

LHL will take advice from the LADO on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

8. Support

8.1 Pupils

LHL may be the only stable, secure and predictable element in the lives of pupils at risk. LHL will ensure that every child has a significant adult who they can turn to, and will endeavour to support pupils through:

- The curriculum to encourage self-esteem and self-motivation;
- The LHL ethos, which promotes a positive, supportive and secure environment and which gives all pupils respect and value;
- A consistent positive attachment approach, which recognises that behaviour is a symptom of underlying issues.

8.2 Staff

Members of staff may be asked to attend a safeguarding pupil case conference for which they should provide a report. Staff involved may be helped by the Designated Senior Lead from the child's prospective school to provide relevant information.

Any member of staff who is concerned about involvement in child protection/safeguarding issues can discuss the matter with the lead teacher..

9. Staff conduct

Staff are expected to adopt a high standard of personal conduct in order to maintain the confidence and respect of colleagues, pupil and parents. Staff should be aware that safe practice also involves using judgement and integrity about behaviour in places other than work.

Any giving of gifts and reward should only be part of an agreed policy for supporting positive behaviour, and should be part of an agreed plan with LHL and child's school.

10. Listening to pupils

LHL recognises the importance of listening to pupils at all times, particularly when they are distressed, worried or concerned. It is appreciated that at times pupils may feel stressed



and confused. If a pupil confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the pupil that he/she has a responsibility to refer the matter to their school's Designated Safeguarding Lead for the pupil's own sake. At the same time, the pupil should be reassured that the matter will only be disclosed to the Designated Safeguarding Lead, who will then decide on appropriate action.

11. Healthy eating

LHL recognises that it has a duty as a sports/education facility to ensure that a healthy eating culture is fostered and forms part of its ethos, where it can. However, LHL will not provide food only refreshments such as water or squash.

12. Confidentiality

Staff have the professional responsibility to share relevant information about the protection of pupils with other professionals, particularly investigating agencies under the guidance of the child's school's Designated Safeguarding Lead. Staff who receive information about children and families in the course of their work must pass on the information without delay to the child's school's Designated Safeguarding Lead.

13. Working with parents

Parents play an important role in protecting their children from abuse. LHL is required to consider the safety of the pupil and should a concern arise, should contact the Designated Safeguarding Lead of the child's school who has the responsibility to seek advice prior to contacting parents.

LHL will work with parents to support the needs of their child, if need be.

LHL takes proactive measures to help parents understand that it has a responsibility for the welfare of all pupils and has a duty to refer cases to the appropriate Local Authority department in the interests of the child. To this end, LHL fosters a strong and effective partnership with parents providing additional support for those families with specific needs.

14. Potential safeguarding issues

LHL recognises the need for all staff to be fully aware of all potential safeguarding issues. Additional guidance on the following issues can be accessed through the "Keeping Children Safe in Education" link on the GOV.UK website:

- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- domestic violence

- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – and Annex A
- forced marriage- and Annex A
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults strategy
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- trafficking
- children and the court system
- children with family members in prison
- county lines
- domestic abuse
- homelessness
- peer-on-peer abuse
- sexual violence and sexual harassment
- “upskirting”

Peer on Peer Abuse

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Peer-on-peer abuse can take various forms, including: serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence.

Child Sexual Exploitation

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

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the



victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child sexual exploitation is a complex form of abuse and it can be difficult for those working with children to identify and assess. The indicators for child sexual exploitation can sometimes be mistaken for 'normal adolescent behaviours'. It requires knowledge, skills, professional curiosity and an assessment which analyses the risk factors and personal circumstances of individual children to ensure that the signs and symptoms are interpreted correctly and appropriate support is given. Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation) consent cannot legally be given whatever the age of the child.

Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

One of the key factors found in most cases of child sexual exploitation is the presence of some form of exchange (sexual activity in return for something); for the victim and/or perpetrator or facilitator.

Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). It is critical to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a child/young person does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family.

Whilst there can be gifts or treats involved in other forms of sexual abuse (e.g. a father who sexually abuses but also buys the child toys) it is most likely referred to as child sexual exploitation if the 'exchange', as the core dynamic at play, results in financial gain for or enhanced status of, the perpetrator. Where the gain is only for the perpetrator/facilitator, there is most likely a financial gain (money, discharge of a debt or free/discounted goods or services) or increased status as a result of the abuse. If sexual gratification, or exercise of power and control, is the only gain for the perpetrator (and there is no gain for the child/young person) this would not normally constitute child sexual exploitation, but should be responded to as a different form of child sexual abuse.

If we are concerned a child is being sexually exploited we will contact the child's school's DSL immediately.



Child Criminal Exploitation

As set out in the [Serious Violence Strategy](#), published by the Home Office, criminal exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

County Lines

As set out in the Serious Violence Strategy, published by the Home Office, County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any sex. They 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. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Schools and colleges should consider the following:

- It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. Schools and colleges should be aware of the importance of:
 - making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
 - not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
 - challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts, vaginas and penises. Dismissing or tolerating such behaviours risks normalising them.
- Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times¹⁰³ more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children;

'Upskirting' has now become a criminal offence and therefore requires a safeguarding responses if happening in school.



When, we as a school, consider issues of sexual violence and harassment between children we will consult the [governmental guidance](#) and seek support from our children's social care partners.

Contextual Safeguarding

[Contextual Safeguarding](#) is an approach to understanding, and responding to, young people's experiences of significant harm and risk beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Therefore children's social care practitioners and school staff need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

If, as a business, we are concerned a child is being exploited in an extra-familial context, as previously outlined, we will contact the school's DSL immediately.

Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges, with [research stating](#) that SEND children can be up to four times more likely to be abused due to additional vulnerabilities. At LHL we will ensure a culture of vigilance that reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

16. Monitoring and review

All staff are expected to monitor their own conduct and relationship with pupils to ensure that the standards expected of them are maintained



Any child protection incidents at LHL will be followed by a review of the safeguarding procedures within LHL and a prompt report to the Governing Body. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to LHL's procedures.

- The Designated Safeguarding Lead will monitor the working of the policy and will report as required to the Principal and the Nominated Governor.
- The Principal will report to the Governing Body annually on the working of the policy.
- The Governing Body will report on the working of the policy in their annual report to LHL Trust.

APPENDIX A

Safeguarding Pupils - Staff Guidance

A. Procedures to be followed

Members of staff who have concerns should report their suspicions to the Designated Safeguarding Lead of the child's chosen school as soon as possible.

Procedures in respect of Child Abuse

Abuse exists where children under the age of seventeen years have been physically or emotionally abused or severely neglected. Abuse of children who are over five years of age is likely to be noticed by staff and Health Workers or Education Welfare Officers. It is essential, therefore that all those whose work brings them into contact with children and their families know the signs of child abuse and are aware of the procedures that they must follow to safeguard the child.

LHL has an important role in recognising and responding to potential indicators of abuse and neglect; all other action should be taken by those with statutory powers to help the child. Early contact and close liaison with such agencies is therefore regarded as essential by LHL.

In the event of an actual or suspected case of child abuse by adults, parents, teachers or any other adult, it is the responsibility of staff to report this to the child's school's Designated Safeguarding Lead as soon as possible. The school's Designated Safeguarding Lead is responsible for ensuring that pupils are identified, and the appropriate agency involved.

B. Indicators of Abuse and Neglect

- Injuries
- Bruises or abrasions especially about the feet, head, genitals or other parts of the body where they would not normally be expected to occur given the age of the child



- Damage or injury to the mouth of a child e.g. bruises or cut lips.
- Bite marks
- Burns and/or scalds especially small circular burns (often cigarette burns)
- Poisoning and other misuse of drugs
- Repeated minor injuries and/or self-harming

Other signs include:

- Lethargy
- Withdrawal
- Wariness
- Passivity
- Frozen awareness
- An unkempt, dirty appearance
- Developmental retardation without a medical condition
- Over-solicitous behaviour towards adults
- Failure to thrive or grow without an underlying medical condition

C. Actions to be taken by Staff

C1. Reporting to the Designated Safeguarding Lead

Any concerns about pupils must be discussed with the Designated Safeguarding Lead (or their named deputy in their absence) from the child's chosen school as soon as possible and at least by the end of the teaching session.

C2. Immediate response to the pupil

It is vital that any staff actions do not abuse the pupil further or prejudice further enquiries, for example:

- Listen to the pupil. If you are shocked by what is being said, try not to show it;
- It is acceptable to observe bruises but not to ask a pupil to remove or adjust their clothing to observe them;
- If a disclosure is made the pace should be dictated by the pupil without them being pressed for detail by being asked detailed or leading questions. It is the staff role to listen, not to investigate. Use open questions such as "is there anything else you want to tell me?" or "yes?" or "and?";
- Accept what the pupil says. Be careful not to burden them with guilt by asking questions such as "why didn't you tell me before?";
- Acknowledge how hard it was for them to tell you this;
- Do not criticise the perpetrator. This may be someone they love;
- Don't promise confidentiality, reassure the pupil that they have done the right thing, explain whom you will have to tell (the DSL) and why. It is important that you do not make promises that you cannot keep such as "it will be alright now".

C3. Recording Information



Staff should:

- Make some brief notes at the time or immediately afterwards; record the date, time, place and context of the disclosure or concern, recording facts and not assumption and interpretation. Notes must be signed and DSL from child's school must be contacted immediately.
- Observed injuries and bruises are to be recorded, dated and relayed back to DSL from child's chosen school immediately.
- Note the non-verbal behaviour and the key words in the language used by the pupil (do not translate into "proper terms"); and
- Keep these original notes and pass them to the Designated Safeguarding Lead of the child's chosen school.

D. Contact details for reporting concerns

Police

101 Safe child, but urgent concern

999 Emergency

NSPCC

24-hour Helpline 0808 800 5000

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0300 123 4666

Email: enquiries@ofsted.gov.uk