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# SAFEGUARDING & CHILD PROTECTION POLICY [016]

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PILGRIM  
PATHWAYS  
SCHOOL



Cambridgeshire  
County Council

<b>Approved by:</b>	Management Committee	<b>Date approved:</b>	January 2023
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## INTRODUCTION

Pilgrim Pathways School fully recognises the responsibility it has under section 175 of the Education Act 2002, to have arrangements in place to safeguard and promote the welfare of children.

This responsibility is more fully explained in the statutory guidance for schools and colleges 'Keeping Children Safe in Education' (September 2023). All staff must be made aware of their duties and responsibilities under Part One of this document, which are set out below.

Staff should read the above document together with 'Annex B' of 'Keeping Children Safe in Education', 2023 and 'What to do if you're worried a child is being abused: Advice for practitioners' (March 2015) if they are working directly with children. For those staff who do not work directly with children or where English is a second language, Annex A can be issued instead but this is a matter for the school/college to decide.

Pilgrim Pathways School works with vulnerable pupils in three Tier 4 hospital settings on the Ida Darwin site (CPFT) and paediatric inpatient wards at Addenbrooke's Hospital (CUH). Safeguarding is of paramount importance and the teaching teams work very closely with the multi-disciplinary teams within the hospitals to safeguard all the children and young people in hospital.

Each hospital has a nurse in charge of safeguarding. There is also a CPFT (Cambridge and Peterborough foundation trust) and CUH (Cambridge University Hospital) safeguarding lead. As teaching staff work within the hospital, all files on child protection are kept on the hospital secure electronic system. This ensures the confidentiality of very sensitive information. If teaching staff have a concern about a child they will inform the Headteacher (DSL) or in their absence, the Deputy DSLs of Pilgrim Pathways School who will immediately inform the nursing team. If immediate action is needed this will be taken up by the safeguarding leads in the hospital or the social worker. Teaching staff are kept informed about child protection plans and are made aware of which children and young people are Children in Need. Teaching staff attend daily handover meetings, weekly multi-disciplinary team meetings and, at Ida Darwin, regular CPA reviews for each child in which any safeguarding or child protection issues are passed on to all staff concerned. On discharge from the hospital any necessary child protection information will be passed on securely to those involved in the child's care.

Through their day-to-day contact with pupils and direct work with families all staff in school have a responsibility to:

- Identify concerns early to prevent them from escalating;
- Provide a safe environment in which children can learn;
- Identify children who may benefit from early help;
- Know what to do if a child tells them they are being abused or neglected;
- Follow the referral process if they have a concern.

This policy sets out how the school's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at the school. Our policy applies to **all** staff, paid and unpaid, working in the school including governors. Teaching assistants, mid-day supervisors, office staff as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact the school and its governors.

This policy is consistent with the Safeguarding Children Partnership Board procedures.

Date of policy: September 2023

There are four main elements to our policy:

**PREVENTION** through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole school protective ethos;

**PROCEDURES** for identifying and referring cases, or suspected cases, of abuse or exploitation. The definitions of the four categories of abuse are attached (see Appendix A);

**SUPPORTING CHILDREN** particularly those who may have been abused or witnessed violence towards others;

**PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN** Processes are followed to ensure that those who are unsuitable to work with children are not employed.

This policy is available to parents on request and is on the school website.

## SECTION 1: PREVENTION

- 1.1 We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children.
- 1.2 The school will therefore:
  - 1.2.1 Establish and maintain an environment where children feel safe in both the real and the virtual world, including in a digital context and are encouraged to talk and are listened to
  - 1.2.2 Ensure children know that there are trusted adults in the school whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate
  - 1.2.3 Tailor our curriculum to be age and stage of development appropriate so that it meets the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
  - 1.2.4 Incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice and equality.
  - 1.2.5 Ensure that all school staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with our 'Responding to Prejudice-Related Incidents Policy'.
  - 1.2.6 Recognising the unique settings which our school operate in and the fact that many of our students have experienced abuse, we will work with ward colleagues to ascertain whether it is appropriate for the below curriculum to be delivered to our students, or whether it is more appropriate for ward colleagues to deliver this through therapeutic or other interventions. Where appropriate, for our Primary provision we will:

- Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:
- How to recognise if family relationships are making them feel unhappy or unsafe and how to seek help or advice from others if needed.
- How to recognise who to trust and who not to trust, how to judge when a friendship is making them feel unhappy or uncomfortable and how to seek help or advice from others, if needed.
- The importance of permission-seeking and giving in relationships with friends, peers and adults.
- That some people behave differently online, including by pretending to be someone they are not.
- The rules and principles for keeping safe online, how to recognise risks, harmful context and contact and how to report them.
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met.
- About the concept of privacy and the implications of it for both children and adults; including that it is not always right to keep secrets if they relate to being safe.
- That each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact.
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know.
- How to recognise and report feelings of being unsafe or feeling bad about any adult or other children.
- How to ask for advice or help for themselves or others, and to keep trying until they are heard.
- How to report concerns or abuse, and the vocabulary and confidence needed to do so.
- Where to get advice e.g. family, school and/or other sources.

(Relationships Education, Relationships and Sex Education (RSE) & Health Education, DfE, 2021)

1.2.7 Recognising the unique settings which our school operate in and the fact that many of our students have experienced abuse, we will work with ward colleagues to ascertain whether it is appropriate for the below curriculum to be delivered to our students, or whether it is more appropriate for ward colleagues to deliver this through therapeutic or other interventions. Where appropriate, for our Secondary provision we will:

- Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:
- How to: determine whether other children, adults or sources of information are trustworthy: judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships); and, how to seek help or advice, including reporting concerns about others, if needed
- The characteristics of positive and healthy friendships
- That some types of behaviour within relationships are criminal, including violent behaviour and coercive control
- What constitutes sexual harassment and sexual violence and why these are always unacceptable
- About online risks, including that any material someone provides has the potential to be shared online and the difficulty of removed potentially compromising material placed online
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically explicit material e.g. pornography presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners.

- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including prison.
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM and how they can affect current and future relationships.
- How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online).

## SECTION 2: PROCEDURES

- 2.1 We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Multi-Agency Procedures'. A copy of these procedures can be found on their website: [Multi-Agency Policies and Procedures | Cambridgeshire and Peterborough Safeguarding Partnership Board \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk)
- 2.2 The Designated Safeguarding Lead is: **Nadine Gooding-Hébert**
- 2.2.1 The Deputy Designated Safeguarding Leads are: **Emma Chandler, Shauna DeWolf, Katie Dzierozynski, Sonia Trickey**
- 2.2.2 The nominated governor for Safeguarding and Child Protection is: **Susannah Green**
- 2.3 The Management Committee will:
- 2.3.1 Appoint a senior member of staff, from the leadership team, to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Lead, DDSL), the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.
- 2.3.2 Ensure that the role of DSL and DDSL is explicit in the role holder's job description (as outlined in Keeping Children Safe in Education, 2023 Annex C).
- 2.3.3 Ensure that the DSL has the appropriate status and authority within the school to carry out the duties of the post. Give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. (See 'Keeping Children Safe in Education, 2023, Annex C). Ensure that the DSL and deputies have undertaken the two-day training provided by the Education Safeguarding Team and that this training is updated **at least every two years**.
- 2.3.4 Ensure that in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g. via updates, meetings or additional training **at least annually**.
- 2.3.5 Ensure that every member of staff, paid and unpaid, and the governing body knows who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concerns from the **point of induction**. Staff members are required to complete a logging concern form and pass it in person to the DSL/DDSL immediately following the procedure detailed on the flowchart and record of concern form in Appendix C (p.31-36).

- 2.3.6 Ensure that the DSL or DDSL are always available (during school hours, during term-time) to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take if in exceptional circumstances the DSL and DDSL are not available. Whilst exceedingly unlikely to happen, if staff cannot get hold of any of the DSL/DDSLS, they should follow the process outlined on p.37-43 in Appendix E and inform the safeguarding lead on the appropriate ward.
- 2.3.7 Liaise with the three safeguarding partners (Local Authority, Integrated Care Board and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2018.
- 2.3.8 Nominate a governor for safeguarding and child protection who has undertaken appropriate training.
- 2.3.9 Ensure every member of staff and every governor knows:
- the name of the Designated Safeguarding Lead/Deputies and their role
  - how to identify the signs of abuse and neglect, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online
  - That children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful
  - how to pass on and record concerns about a pupil/student; that they have an individual responsibility to be alert to the signs and indicators of abuse and exploitation; and for referring safeguarding concerns to the DSL/DDSL;
  - What is meant by, and the importance of, showing professional curiosity
  - that they have a responsibility to provide a safe environment in which children can learn;
  - where to find the Multi-Agency Procedures on the Safeguarding Children Partnership Board website;
  - their role in the early help process;
  - the process for making referrals to children's social care;
  - the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.
  - the role of filtering and monitoring and the process for reporting issues
- 2.3.10 Ensure all staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, at induction. The training should be **regularly updated**, as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively
- 2.3.11 Ensure that **all** staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies including low level concerns and allegations against staff. Ensure all staff members undergo safeguarding and child protection training at induction. Ensure that staff training is regularly updated and that in addition to this training all staff members receive regular safeguarding and child protection updates as required **but at least annually**.
- 2.3.12 Ensure that parents are informed of the responsibility placed on the school and staff in relation to child protection by setting out these duties in the school website.

- 2.3.13 Ensure that this policy is available publicly either via the school website [www.pilgrim.cambs.sch.uk](http://www.pilgrim.cambs.sch.uk) or by other means.
- 2.3.14 Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.
- 2.3.15 Many of our students are dual registered with another educational provider. Co-operation between the Pilgrim Pathways School and the other registered educational provider will occur, as required, in line with 'Working Together to Safeguard Children,' (July 2018), regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.
- 2.3.16 When pupils attend off site or in alternative provision, the school and the provider will have clear procedures about managing safeguarding concerns between the two agencies. Where a young person is attending their own home school e.g. for transition visits, the school safeguarding procedures will apply. For any other providers, written confirmation that the alternative provider has carried out appropriate safeguarding checks on individuals working at the establishment will be sought by the school (see appendix E, p. 37-43). Where off site provision is arranged by the ward staff, they will follow their safeguarding procedures and carry out suitable risk assessments.

## 2.4 Liaison with Other Agencies

The school will:

- 2.4.1 Ensure that all staff within Pilgrim Pathways School liaise closely with other agencies. Staff will receive an update on any child protection issues or safeguarding concerns at the twice daily handover from the Ward multi-disciplinary team. At Ida Darwin, weekly ward rounds occur where school staff meet again with the ward multi-disciplinary team where ongoing communication with external agencies is discussed and actioned when relevant, and every 6 to 8 weeks CPA reviews take place with the multi-disciplinary team, in which all agencies that are involved the child's care are invited and relevant information is passed on. On the Addenbrooke's site, the Teacher in Charge (DDSL) is responsible for identifying concerns from the secure system EPIC, and updating staff as appropriate. They will liaise with clinical staff and the hospital safeguarding team through MDTs or other suitable forums.
- 2.4.2 Work to develop effective links with relevant services to promote the safety and welfare of all pupils/students.
- 2.4.3 Co-operate as required, in line with 'Working Together to Safeguard Children,' (July 2018), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.
- 2.4.4 Notify the relevant Social Care Team immediately if:
- it should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently);
  - there is an unexplained absence of a pupil who is subject to a Child Protection Plan;



- there is any change in circumstances to a pupil who is subject to a Child Protection Plan.

2.4.5 When a pupil who is subject to a Child Protection Plan leaves, information will be transferred to the new school immediately. The Child Protection Chair and Social Care Team will also be informed.

## 2.5 Record Keeping

The school will:

- 2.5.1 Keep clear, detailed, accurate, written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately.
- 2.5.2 All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. It is good practice to keep concerns and referrals in a separate safeguarding file for each child. Records should include:
- a clear and comprehensive summary of the concern;
  - the child's wishes and feelings
  - details of how the concern was followed up and resolved;
  - a note of any action taken, decisions reached and the outcome.
  - A record of any discussion / communication with parents, other agencies etc
- 2.5.3 Ensure electronic records are stored on an identified, purpose-built, secure platform within the hospital network. As Pilgrim Pathways School works within four hospitals all child protection records are held securely on the hospital electronic records. At the Ida Darwin site this is SystemOne. At Addenbrooke's Hospital it is the EPIC system. Safeguarding concerns are also recorded on our internal system using encrypted and password protected documents stored in a secure area accessible only to the DSL/DDSL. Hardcopy safeguarding files are kept confidential and stored securely.
- 2.5.4 Through liaison with the nursing teams safeguarding lead the DSL will ensure all relevant safeguarding records are sent to the receiving school or establishment when a pupil moves schools, within five days, in accordance with 'Keeping Children Safe in Education' (September 2023, p.167) and the Education Safeguarding Team's Guidance on Keeping and Managing Child Safeguarding Records. When a child makes a disclosure at school, we will notify the home school (dual registered, main) within 5 days. Where hospital teams hold responsibility, information sharing will occur as per their protocols. The DSL will consider whether it would be appropriate to share information with the new school/college in advance of a child leaving.
- 2.5.5 Make parents aware that such records exist except where to do so would place the child at risk of harm.
- 2.5.6 Ensure all actions and decisions are led by, what is considered to be, in the best interests of the child.

## 2.6 Confidentiality and information sharing

- 2.6.1 Information about children and their families is defined as 'special category data', i.e. information that identifies a living individual. Collection, storage and sharing of personal data is

governed by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

The school will:

- 2.6.2 Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately.
- 2.6.3 Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children, (as set out in 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).
- 2.6.4 Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent they will refer the request to the DSL or Headteacher.
- 2.6.5 Ensure staff are clear with children that they cannot promise to keep secrets.

The Designated Safeguarding Lead/Deputies will:

- 2.6.6 Disclose information about a pupil to other members of staff on a 'need to know' basis, considering what is necessary, proportionate and relevant. Parental consent may be required.
- 2.6.7 Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent where to do so might place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime.
- 2.6.8 Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' July 2018)
- 2.6.9 In cases where the 'serious harm test' is met, schools must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.
- 2.6.10 Seek advice about confidentiality from outside agencies if required. (See 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).

## **2.7 Communication with Parents/Carers**

- 2.7.1 As the Pilgrim Pathways School works closely with the multi-disciplinary teams in each hospital, communication with parents regarding safeguarding or child protection issues is carried out by the consultant, family therapist social work teams. The teachers in charge of each centre will be kept informed of any communication with parents at the weekly team meeting and will undertake appropriate discussion with parents/carers prior to involvement of another agency unless the circumstances preclude this action. The School will ensure that parents/carers are informed of the responsibility placed on the school and staff in relation to child protection by setting out its duties in the school prospectus/website.

- 2.7.2 Discuss with Children's Social Care if the school/college believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime. Particular circumstances where parents **may not** be informed include any disclosure of sexual abuse or physical abuse where the child has an injury or where it may lead to the loss of evidence.
- 2.7.3 Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, for example if the school/college believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

## 2.8 Prevention of Child-on-child Abuse

We recognise that child on child abuse can manifest itself in many ways. This can include but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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; upskirting part of the Voyeurism (Offences) Act, April 2019) and initiation/ hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

- 2.8.1 All forms of child-on-child abuse are unacceptable and will be taken seriously.

The school will therefore:

- 2.8.2 Create a whole school protective ethos in which child on child abuse, including sexual violence and sexual harassment will not be tolerated.
- 2.8.3 Provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators.
- 2.8.4 Ensure that staff do not dismiss instances of child on child abuse, including sexual violence and sexual harassment as an inevitable part of growing up or banter.
- 2.8.5 Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- 2.8.6 Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes including teaching about consent. Additional guidance on sexting can be found in 'Sexting' in schools: advice and support around self-generated images - What to do and how to handle it, published by CEOP.

- 2.8.7 Ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse referring any concerns of child-on-child abuse to the Designated Safeguarding Lead (or deputy) in line with safeguarding reporting procedures.
- 2.8.21 Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ+ children are at greater risk. School will ensure that these children have a trusted adult in school to talk to.
- 2.8.9 Recognise the risk of intra-familial harms and provide support to siblings following incidents when necessary.
- 2.8.10 The Designated Safeguarding Lead will refer to the Safeguarding Children Partnership Board's [Child-Sexual-Behaviour-Assessment-Tool.pdf](#) ([safeguardingcambspeterborough.org.uk](https://safeguardingcambspeterborough.org.uk)) if there is a concern that a young person may be displaying sexually harmful behaviours, may have experienced sexual violence or sexual harassment or other forms of sexual abuse.

## 2.9 Dealing with Sexual Violence and Sexual Harassment between children

- 2.9.1 Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur wholly online, concurrently online and offline, or technology may be used to facilitate offline abuse. 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. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

The school will:

- 2.9.2 Make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable and will not be tolerated.
- 2.9.3 Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- 2.9.4 Make decisions on a case-by-case basis.
- 2.9.5 Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- 2.9.6 Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- 2.9.7 Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.

- 2.9.8 Liaise closely with external and partner agencies, including CPFT and CUH Ward Safeguarding Leads and Trust Safeguarding Teams, police and social care, when required.
- 2.9.9.1 The Designated Safeguarding Lead will refer to the Safeguarding Children Partnership Board's Child Sexual Abuse Assessment Tool if there is a concern that a young person may have experienced sexual violence or sexual harassment or other forms of sexual abuse.
- 2.9.9.2 Refer to 'Keeping Children Safe in Education - Part Five', 2023, 'Sexual violence and sexual harassment between children in schools and colleges,' (DfE, September, 2022) for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, December 2020)

### SECTION 3: SUPPORTING CHILDREN

The school recognises that **any** child may be subject to abuse and 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 and as such will support all children by:

- 3.1 Providing curricular opportunities to encourage self-esteem and self-motivation.
- 3.2 Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.
- 3.3 Applying the school's behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the pupil's sense of self-worth. The school will ensure that the pupil knows that some behaviour is unacceptable but s/he is valued and not to be blamed for any abuse which has occurred.
- 3.4 Liaising with the senior mental health lead (Clinical Nurse Specialist for Croft, Darwin or Phoenix, Nadine Gooding-Hébert (Addenbrookes)) where safeguarding concerns are linked to mental health in school/college for advice on case management.
- 3.5 Liaising with other agencies which support the pupil such as Social Care, Child and Adolescent Mental Health Services, Cambridgeshire Sexual Behaviour Service or Early Help (Targeted Support) Teams.
- 3.6 Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- 3.7 The school recognises that whilst **any** child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for children in particular circumstances. Please see pages 8 – 9 of Keeping Children Safe in Education, 2022 for the complete list. The list includes:
- 3.8 **Children with Disabilities, Certain Health Conditions, Additional Needs or Special Educational Needs**

We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse. School staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

Our SEND policy is set out in a separate document. Published in 2009, 'Safeguarding disabled children: practice guidance' is an important part of the guidance for everyone involved in safeguarding. We recognise that Children with special educational needs and/or disabilities are at higher risk of harm than most children, yet keeping them safe can be more of a challenge. School staff who deal with children with profound and multiple disabilities, cerebral palsy, sensory impairment and/or emotional and behaviour difficulties, especially those for whom communication is a challenge, are particularly sensitive to signs of abuse. Where children have significant communication difficulties staff will ensure that opportunities for communication, in any form, are given by skilled staff including through liaison with medical colleagues.

The school has pupils with emotional and behavioural difficulties and/or challenging behaviours. The school will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.

The nursing teams and teaching staff work together to teach children personal safety skills commensurate with their age, ability and needs. Children will be taught personal safety skills such as telling and who to tell, good and bad touches and how to manage risk.

As part of the PSHE curriculum, staff will teach children personal safety skills commensurate with their age, ability and needs. Children will be taught personal safety skills such as: how to recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how recognise and manage risk including online. The content of lessons will be shared with parents/carers so that these skills can be supported at home. The school has pupils who may have communication difficulties and we are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead, such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

Where necessary, the school will provide additional training to staff in the use of Makaton, PECS or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the child. Under the Equality Act, there is also a duty to make reasonable adjustments for disabled children and young people.

We promote high standards of practice, including ensuring that disabled children know how to raise concerns, and have access to a range of adults with whom they can communicate.

All pupils at the Ida Darwin Pilgrim Pathways School site have multi-agency planning and involvement to support integrated care. Some also have an Education, Health and Care Plan (EHCP). This is also true for some inpatients at Addenbrooke's Hospital, dependent on the level and nature of their needs.

### 3.8.1 Young Carers

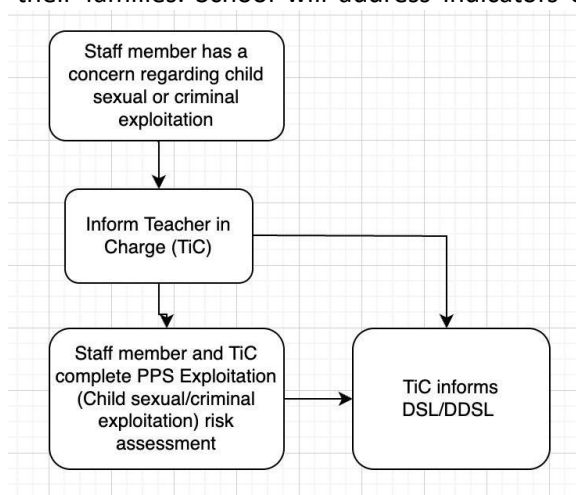
The school recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

School will: seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

### 3.8.2 Children at Risk of Criminal Exploitation

Criminal exploitation of children is a form of harm that is a typical feature of county lines activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

All staff will consider whether children are at risk of abuse or exploitation in situations outside their families. School will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise:



The Designated Safeguarding Lead will complete Safeguarding Children Partnership Board's [Exploitation Risk Assessment and Management Tool](#) and refer to Social Care if there is a concern that a young person may be at risk of criminal sexual exploitation.

The school recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

### 3.8.3 Children at Risk of Child Sexual Exploitation

Child sexual exploitation (CSE) 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.

CSE 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.

Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's [Exploitation Risk Assessment and Management Tool](#) and refer to Social Care if there is a concern that a young person may be at risk of CSE.

The school recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

Pilgrim Pathways School has a named Single Point of Contact (SPOC) for the Police who will work in partnership to identify and provide appropriate support to pupils who have been identified as having 'gone missing' through the authority schemes. Local Education Safeguarding Teams will share Police information of missing child episodes with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child may require.

#### 3.8.4 Children Frequently Absent from Education

The school recognises that children who are absent from education, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, modern slavery, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

The school monitors and follows up on the attendance of individual pupils closely, as outlined in the Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence.

The school endeavours to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult when a child who is absent from education is identified as a welfare and/or safeguarding concern.



When a child is absent from education, the school follows the procedure as set out in Cambridgeshire's Children Missing Education guidance. The school will inform Social Care if a child who is absent from education is subject to a Child Protection Plan or there have been ongoing concerns.

### 3.8.5 Children Misusing Drugs or Alcohol

The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the school will consider such action in the following situations:

When there is evidence or reasonable cause:

To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;

- To believe the pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults;
- Where the misuse is suspected of being linked to parent/carer substance misuse.
- Where the misuse indicates an urgent health or safeguarding concern
- Where the child is perceived to be at risk of harm through any substance associated criminality

### 3.8.6 Children Living with Substance Misusing Parents/Carers

Misuse of drugs and/or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence.

When the school receives information about drug and alcohol abuse by a child's parents/carers they will follow appropriate procedures.

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children
- Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
- Disturbed moods as a result of withdrawal symptoms or dependency
- Unsafe storage of drugs and/or alcohol or injecting equipment
- Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child

### 3.8.7 Children Living with Domestic Abuse

The Domestic Abuse Act 2021 applies to those aged 16 or over and introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are 'personally connected' regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional, coercive or controlling behaviour.

The school recognises that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The school will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

At Pilgrim Pathways School we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass

In order to achieve this, Cambridgeshire's Education Safeguarding Team will share police information of all domestic incidents, where one of our pupils has been present, with the Designated Safeguarding Lead(s) (DSL)/Domestic Abuse (DA) Lead (Nadine Gooding-Hébert).

On receipt of any information, the DSL/DA Lead will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. All information sharing and resulting actions will be undertaken in accordance with the 'Cambridgeshire and Peterborough *Joint Agency Protocol for Domestic Abuse – Notifications to Schools, Colleges and Early Years settings*'.

### **3.8.8 Children at risk of 'Honour- Based' Abuse including Female Genital Mutilation**

So called 'honour-based' abuse (HBA) encompasses incidents which have been committed to protect or defend the honour of the family and/or community, including breast ironing, female genital mutilation (FGM) and forced marriage. The school takes these concerns seriously and staff

are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.

The new Marriage and Civil Partnership (Minimum Age) Act 2023 bans marriage for 16 and 17-year-olds, who no longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18.

It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.

School will manage any concerns relating to forced marriage sensitively and will report concerns immediately via the procedures outlined in this policy.

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is under 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the pupil's wishes.

In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.

### **3.8.9 Children who have returned home to their family from care**

The school recognises that a previously looked after child potentially remains vulnerable. School will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Multi - Agency Procedures.'

### **3.8.10 Children showing signs of Abuse and/or Neglect**

Due to the nature of the hospital settings in which Pilgrim Pathways School operates teaching staff work closely with the nursing teams to support those children and young people who show signs of abuse and neglect. Staff at school recognise that experiencing abuse or neglect may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. School may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these

environments. 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse) criminal exploitation, serious youth violence, county lines and radicalisation.

School will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy.

### **3.8.11 Children at Risk of Radicalisation**

Children are susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

The governing body will ensure that the DSL or DDSL acting as Prevent Lead has undertaken Prevent Lead Awareness training and that all staff receive training about the Prevent Duty.

The following member of staff is the Prevent Lead and has undertaken Prevent Lead training:  
**Emma Chandler**

Staff are required to be alert to changes in children's behaviour which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. The school's/college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral. See also 'The Prevent Duty, Departmental advice for schools and childcare providers', DfE (June 2015), and 'Revised Prevent Duty Guidance: for England and Wales,' HM Government, (April 2021).

### **3.8.12 Privately Fostered Children**

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

The school will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Specialist Fostering Team.

### **3.8.13 Children who have Family Members in Prison**

The school is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child.

The school recognises that children with family members in prison are at risk of poor outcomes including: poverty, stigma, isolation, poor mental health and poor attendance.

The school will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.

The school will work with the family, specialist organisations and the child to minimise the risk of the child not achieving their full potential.

#### **SECTION 4: PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN**

- 4.1 The school will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part Three of 'Keeping Children Safe in Education', 2023. This section should be read in conjunction with the school's Safer Recruitment Policy.
- 4.2 The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

The following members of staff have undertaken Safer Recruitment training:

**Nadine Gooding-Hébert Headteacher**

**Sonia Trickey**

**Sharon Doherty**

#### **4.3 Allegations that may meet the harms threshold (Part Four, Section One)**

- 4.3.1 Any allegation of abuse made against teachers (including supply staff, other staff, volunteers and contractors) that meets the harms threshold as set out in Keeping Children Safe in Education, 2023, Part Four, Section One, will be reported straight away to the Head Teacher.
- 4.3.2 In cases where the Head Teacher or Principal is the subject of an allegation, it will be reported to the Chair of Governors. The school will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2023.
- 4.3.3 The school will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a teacher, member of supply staff or other staff, volunteer or contractor and adhere to the relevant procedures set out in 'Keeping Children Safe in Education', 2023, Part Four and the school's HR Policies, and seek advice from their HR provider.
- 4.3.4 The Headteacher or Chair of Governors will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken.
- 4.3.5 Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.
- 4.3.6 Where the school or college identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately.
- 4.3.7 School/college will consider:

- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

4.3.8 The school will ensure that any disciplinary proceedings against staff, supply staff or volunteers relating to child protection matters are concluded in full even when the member of staff, supply staff or volunteer is no longer employed at the school and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

4.3.9 Staff (including supply staff and volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

#### 4.4 Concerns that do not meet the harms threshold (Part Four, Section Two)

4.4.1 Low level concerns that do not meet the harms threshold should be reported to the Headteacher. NB: The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.

4.4.2 In cases where the Head Teacher or Principal is the subject of an allegation, it will be reported to the Chair of Governors. The school will follow the procedures set out in Part Four, Section Two of 'Keeping Children Safe in Education', 2023.

4.4.3 The school/college will deal with any such concern, no matter how small, where an adult working in or on behalf of the school or college may have acted in a way that:

- 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.

4.4.4 All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

4.4.5 Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). At Pilgrim Pathways School concerns are held in the staff HR files, which is a secure location in the main office.

4.4.6 The school will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This will enable the school/college to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse;

and ensure that adults working in or on behalf of the school/college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

- 4.4.7 School/College should ensure that **all** staff, including supply staff, volunteers and contractors, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022). As part of the Induction process, all staff, including supply staff, volunteers and contractors, will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable. Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- 4.4.8 All staff have signed to confirm that they have read 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022).
- 4.4.9 The school will ensure that staff, supply staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

## SECTION 5: OTHER RELATED POLICIES AND PROCEDURES

### 5.1 Use of Mobile Phones and Other Smart Devices Policy

- 5.1.1 Our policy on use of mobile phones and other smart devices, cameras and sharing of images is set out in a separate document and is reviewed annually. It is recognised that personal mobile phones have the potential to be used inappropriately and therefore the school has developed a policy to outline the required protocol for all staff, students, volunteers and parents/carers.
- 5.1.2 Each unit has bespoke protocols for the use of mobile phones and other devices, due to the vast variation of need and risk.

## SECTION 6: GOVERNING BODY SAFEGUARDING RESPONSIBILITIES

- 6.1 Governing bodies should ensure they facilitate a whole school/college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- 6.2 The governing body fully recognises its responsibilities with regards to safeguarding and promoting the welfare of children. It aims to ensure that the policies, procedures and training in school are effective and comply with the law and government guidance at all times.

It will:



- Nominate a governor for safeguarding who will take leadership responsibility for the school's safeguarding arrangements and practice and champion safeguarding issues.
- Ensure that all governors, Management Committee members, Academy Councillors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated.
- Ensure governors and trustees are aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010 and 2021, the Public Sector Equality Duty and the local multi-agency safeguarding arrangements.
- Ensure an annual safeguarding report (Annual Safeguarding Monitoring Report for Governors) is made to the full governing body and copied to the Education Safeguarding Team. Any weaknesses will be rectified without delay.
- Ensure that this Safeguarding and Child Protection policy is annually reviewed, ratified, updated and understood and followed by all staff.
- It will be published on the school website.
- Ensure that children's exposure to potential risks while using the internet is limited by having in place age appropriate filtering and monitoring systems and ensure the effectiveness is regularly reviewed.
- Ensure children's wishes and feelings are taken into account where there are safeguarding concerns.

### 6.3 Use of school/college premises for non-school/college activities

- 6.3.1 If the governing body provides extended school/college facilities or before or after school activities directly under the supervision or management of school staff, the school's arrangements for safeguarding as written in this policy shall apply.
- 6.3.2 Where services or activities are provided separately by another organisation or individual, either on or off school site, the governing body will seek assurance that they have appropriate policies and procedures in place to keep children safe and there are arrangements to liaise with the school on these matters where appropriate.
- 6.3.3 The governing body will use the guidance on 'Keeping children safe in out-of-school settings' which details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

This policy was reviewed on 23/09/2023 and will be reviewed in September 2024

Signed by the Headteacher *N Gooding-Hébert*

Chair of Governors .....

Designated Safeguarding Lead *N Gooding-Hébert*

## SECTION 7: OTHER RELATED POLICIES AND DOCUMENTS



This policy links to our:

Anti-bullying policy

Attendance and Admissions policy (including Children who are absent from Education – see SEND pathway in SEND policy)

Behaviour for Learning policy

Complaints procedure

Critical Incident Policy

Equality & Community Cohesion policy

First Aid policy

Health and Safety policy

Lone Working policy

Online Safety and Acceptable Use policy

Physical Intervention policy

Responding to self-harm policy

Safer Recruitment policy

SEND Policy

Staff Code of Conduct/Safer Working Practice

Staff Discipline and Grievance procedures

Supporting Pupils with Medical Conditions policy

Whistleblowing policy

E-Safety and Acceptable Use Policy (which includes online and mobile phones/other smart devices)

☐ Home Visits Policy

Intimate Care Policy (Intimate Care is not undertaken by Pilgrim Pathways school: this is managed by the ward staff)

Responding to Prejudice Related Incidents Policy

Visitors & Volunteers in Schools Policy

When to Call the Police

**Other relevant documents:**

“Keeping Children Safe in Education: Statutory guidance for schools and colleges” (September 2021) “Guidance for Safer Working Practice for those working with children and young people in education settings” (May 2019)

“Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (July 2018)

“The Prevent Duty, Departmental advice for schools and childcare providers” (June 2015)

“Revised Prevent Duty Guidance: for England and Wales” (July 2015)

“Sexual violence and sexual harassment between children in schools and colleges” (September, 2021)

Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, December 2020)

“What to do if you’re worried a child is being abused: Advice for practitioners” (March, 2015)

“Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children” (July 2018)

## Appendix A: Four categories of abuse

**Abuse** 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. 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. Children may be abused by an adult or adults or by another child or children.

**Physical Abuse** - may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Neglect** - persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

It may occur during pregnancy as a result of maternal substance misuse. It may involve the neglect of or lack of responsiveness to a child's basic emotional needs. It also includes parents or carers failing to:

- Provide adequate food, clothing and shelter including exclusion from home or abandonment
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision including the use of inadequate care-givers
- Ensure access to appropriate medical care or treatment

**Emotional Abuse** - Is the persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to a child that they are:

- Worthless
- Unloved
- Inadequate
- Valued only insofar as they meet another person's needs

It may include:

- not giving the child opportunities to express their views
- deliberately silencing them
- 'making fun' of what they say or how they communicate

It may also feature age or developmentally inappropriate expectations being imposed on children including:

- interactions that are beyond the child's developmental capability
- overprotection and limitation of exploration and learning
- preventing participation in normal social interaction. It may involve:
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger
- The exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment although it may occur alone.

**Sexual Abuse** – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

This may involve:

- physical contact including assault by penetration (e.g. rape or oral sex)
- non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

Non-contact activities involving:

- children in looking at, or in the production of, sexual images,
- children in watching sexual activities
- or encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

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

**Child Criminal Exploitation** - Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

**Appendix B: Useful Contacts – Cambridgeshire and Peterborough**

Cambridgeshire and Peterborough Safeguarding Children Partnership Board – Safeguarding Multi-Agency Procedures

Education Safeguarding Team	<a href="mailto:ecps.general@cambridgeshire.gov.uk">ecps.general@cambridgeshire.gov.uk</a>
Education Safeguarding Manager – Sara Rogers	<a href="mailto:sara.rogers@cambridgeshire.gov.uk">sara.rogers@cambridgeshire.gov.uk</a>
Early Help Hub (EHH) - Targeted Support Service	Tel: 01480 376666
Customer Service Centre – social care referrals	Tel: 0345 045 5203
Emergency Duty Team (out of hours)	Tel: 01733 234724
Police Child Abuse Investigation Unit	Tel: 101
Local Authority Designated Officer (LADO)	Tel: 01223 727967 <a href="mailto:lado@cambridgeshire.gov.uk">lado@cambridgeshire.gov.uk</a>
Senior Leadership Adviser – Phil Nash	Tel: 07920 270820
Prevent Officers	<a href="mailto:prevent@cambs.police.uk">prevent@cambs.police.uk</a> Tel: 01480 422596

**Useful Contacts – Peterborough**

Education Safeguarding Lead – Sue Proffitt	<a href="mailto:Susan.Proffitt@Peterborough.gov.uk">Susan.Proffitt@Peterborough.gov.uk</a>
Early Help	Tel: 01733 863 649
Customer Service Centre – Social Care Referrals	Tel: 01733 864 180
Emergency Duty Team (Out of Hours)	Tel: 01733 234 724
Local Authority Designated Officer (LADO)	
Gisela Jarman	Tel: 01733 864 038
Jane Bellamy	Tel: 01733 864 790

**Relevant Documents**

“Keeping Children Safe in Education: Statutory guidance for schools and colleges” (September 2023)

“Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings” (April 2022)

“Guidance for Safer Working Practice for those working with children and young people in education settings” (February 2022)

“Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (July 2018)

“Meeting digital and technology standards in schools and colleges, Filtering and monitoring standards for schools and colleges” (March 2023)

“The Prevent Duty, Departmental advice for schools and childcare providers” (June 2015)

“Revised Prevent Duty Guidance: for England and Wales” (April 2021)

“Sharing nudes and semi-nudes: advice for education settings working with children and young people” (UKCIS, December 2020)

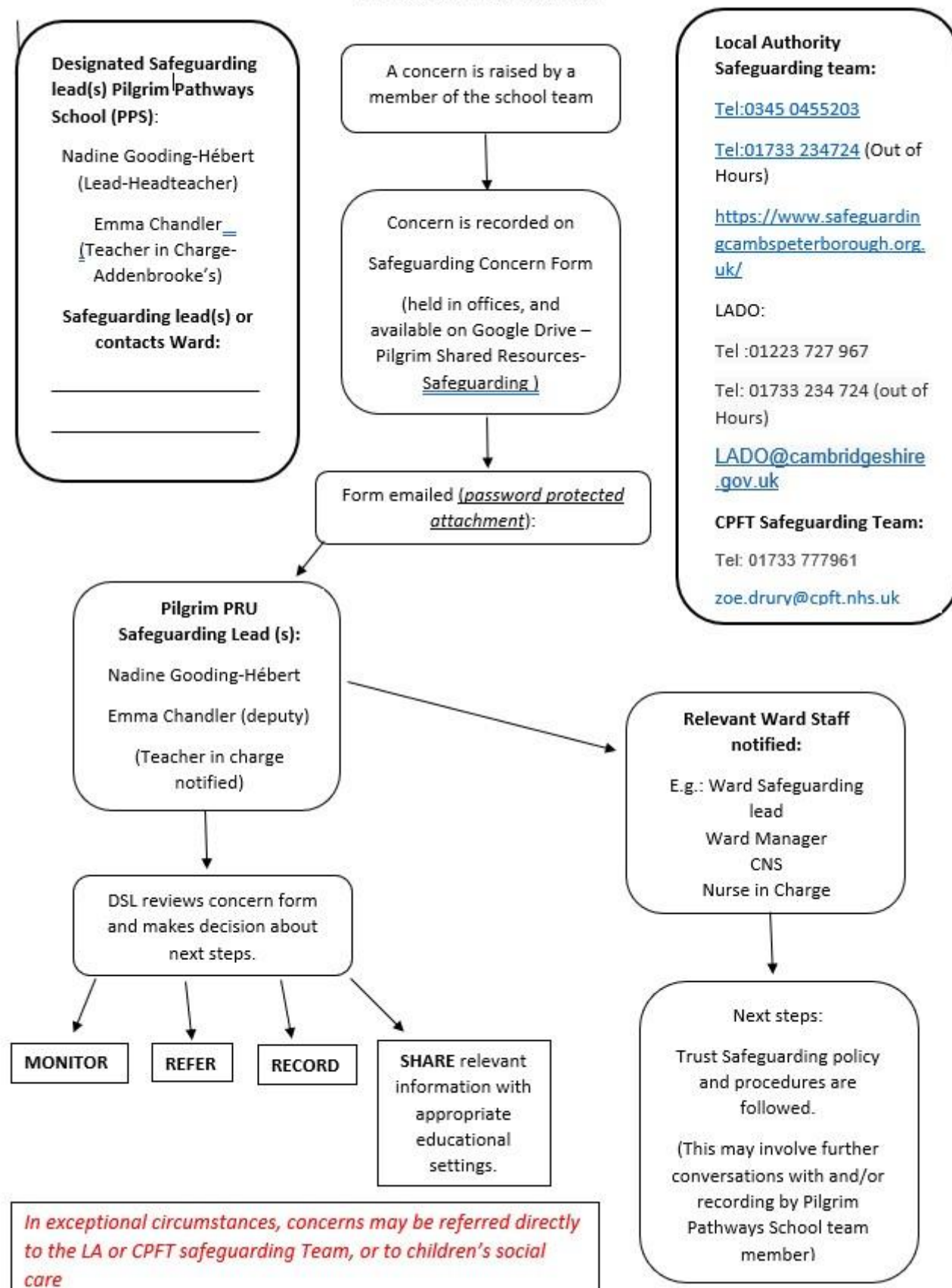
“What to do if you’re worried a child is being abused: Advice for practitioners” (March 2015)

“When to Call the Police: guidance for schools and colleges,” (National Police Chief Council)

“Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children” (July 2018)

## Appendix C Raising A Safeguarding Concern Flow Chart

## FLOWCHART FOR RAISING CONCERNS ABOUT A CHILD WHO IS AN NHS INPATIENT AND ON ROLL WITH THE PILGRIM PATHWAYS SCHOOL



**Appendix D: Raising A Safeguarding Concern Reporting Form****Safeguarding Concern Form**

Staff, volunteers and regular visitors are required to complete this form and pass it to Nadine Gooding-Hébert (DSL) if they have a safeguarding concern about a child in our school.

Information Required	Enter Information Here
Full name of child	
Date of birth	
Class/tutor group/form group	
Your name and position in the school	
<p>Nature of concern/disclosure</p> <p><i>Please include where you were when the child made a disclosure, what you saw, who else was there, what did the child say or do and what you said.</i></p> <p><i>[Ensure that if there is an injury this is recorded (size and shape) and a body map is completed]</i></p> <p><i>[Make it clear if you have a raised a concern about a similar issue previously]</i></p>	
Time & date of incident:	

Name and position of the person you passing this information to?	
Your Signature	
Time and date form completed	

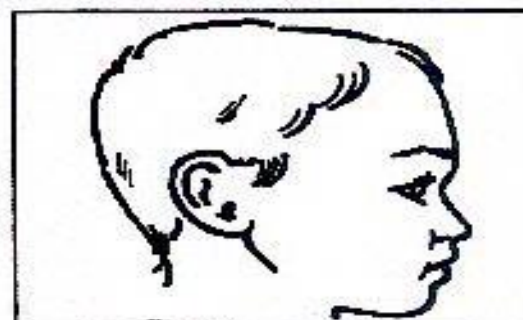
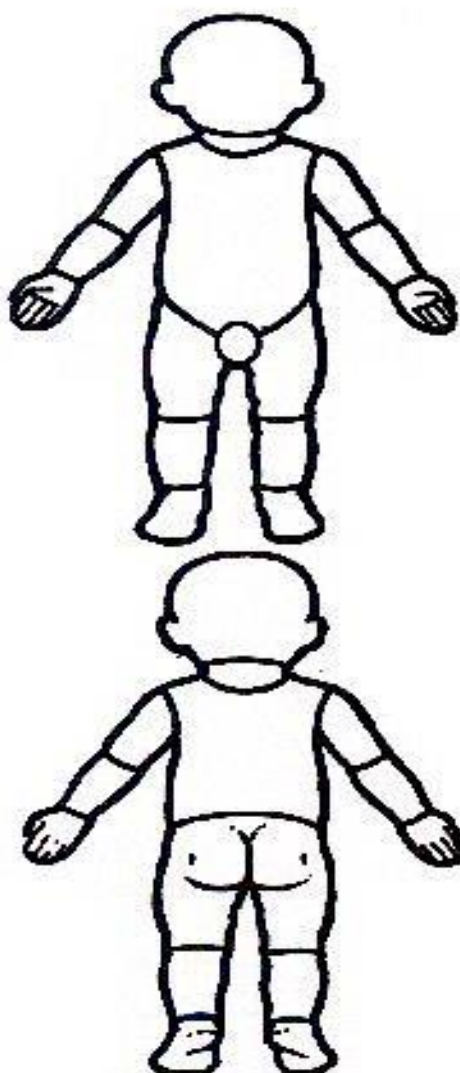
Information Required	Enter Information Here
Time form received by DSL	
Action Taken by DSL	
Referral made to Attendance Lead [yes/no, date and time]	
Referral made to police [yes/no, date and time]	
Referral made to Just One Norfolk [yes/no, date and time]	
Referral made to CADS [yes/no, date and time]	
Referral made to PSA [yes/no, date and time]	
Referral made to Community & Partnerships [yes/no, date and time]	



Referral Made to Other Agency [yes/no, date and time, name of organisation]	
Parents Informed [yes/no, date and time]	
Feedback given to pastoral team  [yes/no, date and time]	
<b>Information Required</b>	<b>Enter Information Here</b>
Feedback given to teacher  [yes/no, date and time]	
Feedback given to child  [yes/no, date and time]	
Feedback given to person who recorded disclosure  [yes/no, date and time]	
Further Action Agreed	
Full Name of DSL	
Signature of DSL	
Date of Signature	

Body Map

Young Child

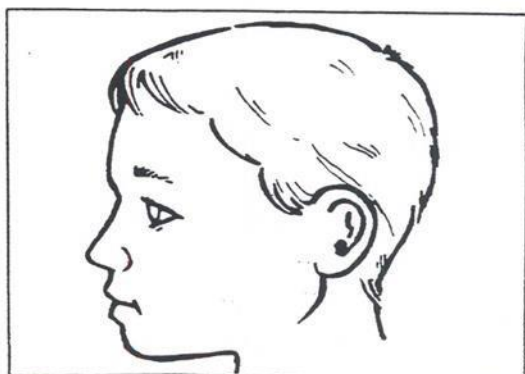
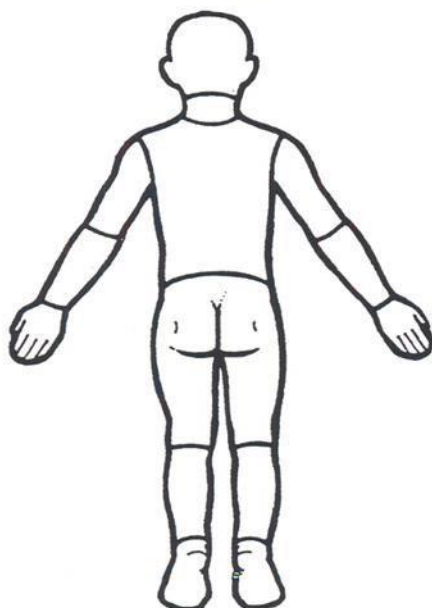
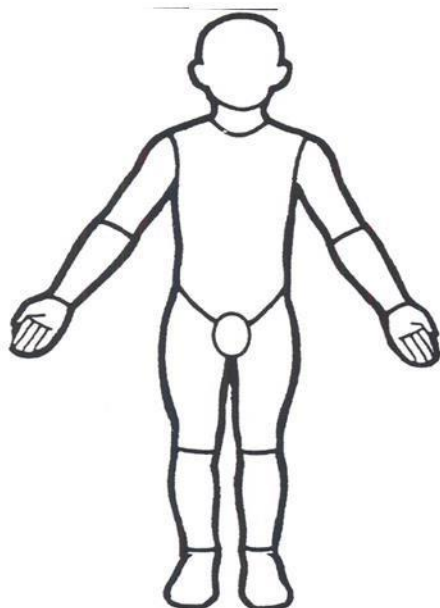


Indicate clearly where the injury was seen and attach this to the referral form

Body Map

Older

Child



Indicate clearly where the injury was seen and attach this to the referral form

## Appendix E

~~Commissioning unregulated Alternative Provision  
Model policy for schools~~

~~Responsibility for the alternative provision used rests with the commissioner<sup>‡</sup>~~

<del>Date of policy review</del>	
<del>Reviewed by</del>	
<del>Role</del>	
<del>SLT responsible for oversight of the commissioning of unregulated AP</del>	
<del>Operational lead with oversight (does not have to be SLT)</del>	
<del>Nominated governor/trustee with oversight of the commissioning of unregulated AP</del>	
<del>Policy due for review (date)</del>	
<del>This policy must be read in conjunction with these school policies</del>	<del>Safeguarding Behaviour Attendance Medical Needs</del>

<sup>‡</sup>~~Alternative provision – GOV.UK (www.gov.uk), p11~~

## References

Alternative Provision Statutory guidance for local authorities; January 2013

Independent schools inspection handbook – GOV.UK (www.gov.uk)

Keeping children safe in education 2022 (publishing.service.gov.uk)

Registration of independent schools, Departmental advice for proprietors and prospective proprietors of independent schools in England; August 2019

School inspection handbook – GOV.UK (www.gov.uk)

School suspensions and permanent exclusions – GOV.UK (www.gov.uk)

Working together to improve school attendance – GOV.UK (www.gov.uk)

## Definition and purpose

This policy aims to provide clear guidance to *[name of school]* colleagues and partners in the commissioning of 'unregulated' alternative provision [AP]. The term 'unregulated' (also referred to as unregistered) to define an AP setting which is not a registered school or college (for pre-16 pupils). There are, however, unregulated AP settings which are registered for post-16 and also offer education/training to school-age pupils.

Unregulated AP settings may deliver an educational, (academic and/or vocational), social, emotional, physical and/or sensory offer, during the school day, where that provision cannot be met in school.

Typically, unregulated AP settings are used to provide alternative education or training to pupils to complement their timetable and core offer in school. Current government guidance does not always differentiate between **regulated or registered AP** (e.g., an alternative school setting for a pupil who has been permanently excluded from school, such as a pupil referral unit or short-stay school, or a hospital school) and **unregulated AP** (e.g., where a young person may access a

- ~~vocational course for 1-2 days per week). Pupils accessing unregulated AP remain on the roll of their home school. The guidance states:~~
- ~~2—Local authorities are responsible for arranging suitable education for permanently excluded pupils, and for other pupils who—because of illness or other reasons—would not receive suitable education without such arrangements being made.~~
  - ~~3—Governing bodies of schools are responsible for arranging suitable full-time education from the sixth day of a fixed period exclusion.~~
  - ~~4—Schools may also direct pupils off-site for education, to help improve their behaviour.~~
  - ~~5—Statutory guidance sets out the Government’s expectations of local authorities and maintained schools who commission alternative provision and pupil referral units. The Government expects those who are not legally required to have regard to the statutory guidance to still use it as a guide to good practice.<sup>2</sup>~~

### ~~**Power of schools to direct a pupil off-site for education to improve behaviour**~~

- ~~• Governing bodies of maintained schools have the power to direct a pupil off-site for education to improve his or her behaviour. The Secretary of State has made regulations, as is required by the related primary legislation, concerning schools’ use of this power.~~
- ~~• Under revised off-site regulations, the governing body must:~~
  - ~~◦ ensure that parents (and the local authority where the pupil has a statement of special educational needs) are given clear information about the placement: why, when, where, and how it will be reviewed~~
  - ~~◦ keep the placement under review and involve parents in the review. The regulations specify regular reviews but do not specify how often reviews must take place (that should be decided on a case-by-case basis). Reviews should be frequent enough to provide assurance that the off-site education is achieving its objectives and that the~~

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<sup>2</sup> ~~Alternative Provision Statutory guidance for local authorities; January 2013~~

~~pupil is benefitting from it; and have regard to guidance from the Secretary of State on the use of this power—new statutory guidance on this issue can be found below at paragraph 41~~

~~• This legislation does not apply to Academies. They can arrange off-site provision for similar purposes under their general powers, set out in the Academy Trust's Articles of Association. Though the regulations and guidance do not apply, they can provide Academies with an example of good practice.<sup>3</sup>~~

~~As above, schools may commission off-site alternative provision (registered or unregistered) to improve behaviour, help prevent a suspension or permanent exclusion, or arrange suitable education for a suspended pupil (from the sixth school day of a suspension or permanent exclusion) under section 100 of the Education and Inspections Act 2006. Governors and Headteachers must adhere to the regulations set out in School suspensions and permanent exclusions—GOV.UK (www.gov.uk). For further detail on the use of off-site direction to improve behaviour, see the Norfolk County Council Directory of Unregulated Alternative Provision at Unregulated alternative provision templates – Schools (norfolk.gov.uk).~~

~~Pupils who may benefit from unregulated AP are often within the most vulnerable cohort. They may have special needs (with or without an EHCP), medical needs, attendance difficulties, challenging behaviour, a social worker, be suspended (after day 6), at risk of permanent exclusion, in care and/or known to supporting agencies such as the Youth Justice Service for example.~~

~~Unregulated AP settings are not inspected by Ofsted or any other national body, though Ofsted inspectors may visit an unregulated AP setting as part of a school's inspection (see Ofsted).~~

~~The lack of a set of national standards or inspectorate, and the fact that it is often the most vulnerable pupils who access such provisions make it imperative that the commissioning of unregulated AP is carried out in~~

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<sup>3</sup> Alternative Provision Statutory guidance for local authorities; January 2013



~~the best interests of the pupil, with safeguarding as a priority. This policy aims to ensure that all [name of school] colleagues involved in the commissioning of unregulated AP follow correct procedures.~~

### ~~Ofsted~~

~~During an Ofsted inspection, the following will apply. Numbers and page references in brackets refer to the School inspection handbook- GOV.UK (www.gov.uk) and Independent schools inspection handbook- GOV.UK (www.gov.uk) (paragraph numbers in italics for the latter- delete as appropriate). Note that this is a summary only; further detail can be located via the inspection handbooks and the Norfolk County Council Directory of Unregulated Alternative Provision~~

~~<sup>4</sup>—**Information request (86/72, 92)**: The lead inspector will request information about any off-site AP during the initial telephone conversation. In order that this information is readily available, [name of school] will maintain an accurate and up to date register/log of all pupils attending off-site AP. Responsibility for ensuring that this record is up to date is overseen by [role/name of colleague]. The register will include (as a minimum) names of pupils, year groups, key information (e.g., EHCP, LAC, EAL etc.), AP attended, key contact, address, days and times, the core purpose(s) of the provision.~~

- ~~•—**Parent carer views (99-100)**: Ofsted provide a letter to pass on to parent carers to notify them of an inspection. [Role/name of colleague] will ensure that the parent carers of all pupils attending off-site AP receive this notification.~~

- ~~•—**AP contact/visits (100, 287, 363/228, 252, 317-319)**: [Role/name of colleague] will ensure that all unregulated AP settings commissioned by the school are informed of an inspection. In some cases, inspectors will telephone or visit an unregulated AP setting to verify that [name of school's] leaders have ensured that the placement is safe and appropriate.~~

- ~~•—**Registration status<sup>4</sup> (362/318, 322)**: Inspectors will ask the school about the registration status of any APs that they use. Any~~

<sup>4</sup>Registration of independent schools, Departmental advice for proprietors and prospective proprietors of independent schools in England; August 2019



~~provider of AP must be registered as an independent school if it caters full time for 5 or more pupils of compulsory school age, or one pupil who is in care and/or has an education, health and care plan [EHCP]. [Name of school] will ensure that the registration status of any unregulated AP has been checked to ensure that it is not using a provider operating as an illegal school. If the school uses AP that should be registered but is not, inspectors will carefully consider whether this affects the likelihood that pupils are safeguarded effectively. If the school uses an unregistered provider unknown to Ofsted, the inspector will inform the duty desk of the Ofsted unregistered schools team.~~

- ~~• **Rationale (365/321):** Inspectors will consider the appropriateness of the commissioned placement(s), whether leaders at [name of school] have ensured that appropriate checks have been carried out, the extent to which the pupil(s) benefit from a broad and balanced curriculum if they attend off-site AP, and the attendance, behaviour and personal development of those pupils.~~

- ~~• **Ofsted judgements (266, 367; pp90-92; pp95-97/323; pp79-81; pp83-85):** Most importantly, inappropriate or insufficient checks on the commissioning of unregulated AP may have serious consequences for the safety of a child. In addition, this may also negatively impact on an Ofsted inspection judgement. [Name of school] recognises that ineffective or inappropriate checks may lead to an inadequate judgement for leadership and management. Likewise, if pupils attending unregulated AP behave poorly or are unsafe, this may result in an inadequate judgement for behaviour and attitudes.~~

### **Safeguarding**

~~There are currently no formal safeguarding requirements for safeguarding training in unregulated AP settings. Commissioning schools are required to check safeguarding arrangements at each~~

~~unregulated AP setting used. [Name of school/] will use the document **01 Pre-placement visit record**<sup>5</sup> (Appendix 1) to ensure that all safeguarding checks have been carried out pre-placement.~~

~~Keeping children safe in education 2022 ([publishing.service.gov.uk](https://publishing.service.gov.uk)) requires the following:~~

~~327. 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.~~

~~328. Schools should obtain **written confirmation** from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that the school would otherwise perform in respect of its own staff. (See Appendix 7)~~

~~[Name of school/] will ensure that all unregulated settings commissioned are provided with the following key information. This may be recorded using the document **02 Initial Referral and Admissions (Appendix 2)** or Service Level Agreement.~~

~~4—Name and contact details (telephone and email) for the school's Designated Safeguarding Lead~~

~~5—Clear Service Level Agreement on how safeguarding concerns will be communicated, followed up and by whom; and how regular communication between the school and unregulated AP will be assured.~~

~~Appendix 2 may also be used for this purpose.~~

~~Pupils attending unregulated AP may feel more at ease and therefore make disclosures more readily. It is therefore essential that the school and AP setting agree procedures before any placement starts. It may be good practice for *Pupils attending off-site AP* to be a standing agenda item for DSL meetings, to ensure that colleagues responsible for safeguarding are able to address issues and identify any patterns or trends.~~

~~{Name of school} will ensure a risk assessment is undertaken before the child starts which assures the school that there are appropriate safeguarding arrangements in place. A schedule of visits should be implemented to provide ongoing assurances that the unregulated AP is appropriate for the child and safeguarding arrangements in place are robust.~~

~~{Name of school} will gain assurances from the unregulated AP in relation to their safeguarding policy, and procedures, the training attended by staff and that appropriate safer recruitment checks have been undertaken as required in part 3 of Keeping children safe in education - GOV.UK (www.gov.uk) See also Appendix 7.~~

~~Pupils attending unregulated AP should know how to report worries or concerns and to whom. This should be the same for their parents or carers. There should be a relationship where children can talk freely to all members of staff if they are concerned or worried. Children will be reassured that they are safe and everything they say is taken seriously.~~

~~{Name of school} will ensure that relevant staff have regular communication with the child to give them the opportunity to share what is going well and ask if they have any concerns.~~

### **Attendance**

~~It is essential that the unregulated AP setting communicates attendance on a **daily** basis. Agreement on how and at what time this will be done must be reached and recorded pre-placement (see Appendix 2 or use the Service Level Agreement). It is not sufficient for an AP setting to only communicate absence; schools must be informed of positive attendance within 30 minutes of the pupil's planned arrival at the AP (unless accompanied by a member of school staff).~~

~~Pupils attending an off-site **registered** AP school (such as a PRU or hospital school) should be coded as D as they will be temporarily dual-registered.~~

~~Pupils attending off-site unregulated AP where there is **face-to-face, supervised provision**, should be coded as B in the register, but only once the AP setting has confirmed daily attendance. The register **must not** be flood-coded ahead of time.~~

~~Some pupils may be accessing online provision which is not face-to-face (even on screen); this should be coded as C.~~

~~Further detail and guidance is available at Working together to improve school attendance – GOV.UK (www.gov.uk)~~

### **Pre-placement**

~~Pre-placement, *[name of school]* will ensure that the following checklist has been met:~~

- ~~4—Liaison with all relevant stakeholders (including the pupil, parent carer, EHCP Coordinator, social worker, Virtual School Advisor for Children in Care, health professional etc.) to ensure that the planned provision is in the best interest of the child~~
- ~~5—Following initial contact with the AP setting, a site visit and record using the **01 Pre-placement visit record (Appendix 1)**~~
- ~~6—Completion of the **02 Initial Referral and Admissions (Appendix 2)** form to include the following:~~
  - ~~6.1—Key pupil details~~
  - ~~6.2—Emergency contacts~~
  - ~~6.3—Agreed course offer, start date, length of course including a taster day if appropriate~~
  - ~~6.4—Agreement that the pupil will attend **no more** than 4 sessions (2 days) per week, to avoid any risk of the setting being deemed an illegal school (see above and also the Norfolk County Council Directory for more information)~~
  - ~~6.5—Key professional contacts~~
  - ~~6.6—Core aims and objectives of the placement~~
  - ~~6.7—How progress will be monitored and communicated back to *[name of school]* (when, how, how often)~~
  - ~~6.8—If and how the placement contributes to the pupil's post-16 plans~~

- ~~6.9 — SEND/EAL needs of the pupil, including relevant EHCP targets as appropriate~~
- ~~6.10 — If appropriate, links to the pupil's Individual Healthcare plan; GP contact details~~
  - ~~6.11 — Youth Justice Service contacts if appropriate~~
- ~~6.12 — How **daily** attendance will be reported back to [name of school], procedures for non-attendance~~
- ~~6.13 — School DSL contact details and agreement for the recording and communicating of safeguarding concerns~~
  - ~~6.14 — Photo consent~~
- ~~6.15 — Behaviour expectations which are in line with the school's own policy (i.e., no smoking etc.); the **04 Learner Code of Conduct (Appendix 4)** may be used. How will behaviour incidents (including praise and positive feedback) be communicated? How will such feedback contribute to [name of school's] tracking system for behaviour (and impact on rewards if, for example, reward trips depend on a number of positive points earned)~~
  - ~~6.16 — Risk assessment~~
- ~~6.17 — Agreement of what will happen if the pupil is suspended from school and the suspension impacts on the days during which they would normally be at the AP~~
  - ~~6.18 — Equipment, clothing required~~
- ~~6.19 — Contact with animals and any relevant risk assessments~~
  - ~~6.20 — Transport~~
- ~~6.21 — How lunches and/or snacks will be provided; especially if the pupil is in receipt of Free School Meals, and/or if they have a food allergy/intolerance/are pregnant etc.~~
- ~~6.22 — How the setting/school will communicate with parent/carers~~
- ~~6.23 — If a TA or other school colleague will accompany the pupil, their contact details and what will happen if that colleague is absent for any reason~~
- ~~7 — If relevant, a pre-placement baseline assessment (helpful if the placement is for social, emotional and/or to improve behaviour). Suggestions are available in the document **03 Pre-placement baseline (Appendix 3)** if the school does not already have a social and emotional tracking system in place.~~

- ~~8—Funding: additional funding may be available to the school for an AP placement. Please refer to SEND funding—Schools (norfolk.gov.uk) for further guidance~~
- ~~9—The operational lead for the oversight of pupils attending off-site AP will ensure that all relevant documentation (including emails) are stored centrally at *[name system/drive etc.]* to ensure access as required. Access to key information should depend on the system, not a person.~~
- ~~10—*[Name of school]* understands that when AP is commissioned to meet the specific needs of a pupil, they have the responsibility to ensure that the pupil is not disadvantaged in respect of being kept safe, attendance or educational outcomes, including personal development (access to visits and trips, for example).~~

### **Mid-placement**

~~Pre-placement, *[name of school]* and the AP provider will have agreed the frequency and method of progress reporting. This should take place at least once every half-term.~~

~~During the placement, a school colleague will visit the pupil on site and observe them undertaking the activity. A record of this visit should be logged on the form **05 Alternative Provision Progress visit record (Appendix 5)**.~~

~~Where possible, the pupil's perspective and views should be recorded on the form **06 Mid or End of placement evaluation (Appendix 6)**. If special needs are a barrier to communication, other methods may be appropriate (such as photographs showing that a non-verbal pupil is happy and engaged, for example).~~

~~Parent carers and the centre lead at the provision (or relevant tutor or key worker) should also complete form **06 Mid or End of placement evaluation (Appendix 6)**. If relevant, other professionals (such as an EHCP Coordinator or Virtual School for Children in Care Adviser) may also contribute their views.~~

~~Evaluations and placement evidence may be shared during PEPs or EHCP reviews as appropriate.~~

~~If the mid-placement visit record and/or evaluation show that changes are required to the offer, such as the type of activity, days or times attended etc., then this should be reviewed, and the initial admissions form amended to reflect the changes.~~

~~Any pre-placement baseline assessments may be repeated mid-placement to demonstrate progress.~~

### **~~End of placement~~**

~~At the end of the placement, the form **06 Mid or End of placement evaluation (Appendix 6)** should be completed by the school, pupil, AP setting and parent/carer. If relevant, other professionals (such as an EHCP Coordinator or Virtual School for Children in Care Adviser) may also contribute their views.~~

~~Any pre-placement baseline assessments may be repeated at the end of the placement to demonstrate progress.~~

### **~~Governance~~**

~~[Name of school] will ensure that there is effective governance and oversight of the school's commissioning of unregulated AP. The nominated governor/trustee is named on the front of this policy.~~

~~The nominated governor will monitor [name of school's] use of unregulated AP via the Headteacher's termly report to governors (if a section for this does not pre-exist, it is recommended that it be added) and via the operational lead for this area of work.~~

~~The nominated governor will ensure that this policy is updated annually, in line with national and local guidance.~~

**Appendix 1****Unregulated Alternative Provision****Pre-placement visit record**

<b>Name of AP setting</b>	
<b>Address</b>	
<b>Telephone</b>	
<b>Key contact at the AP setting (name/role)</b>	
<b>Email</b>	
<b>Pre-placement visit carried out by (name/role)</b>	
<b>School/organisation</b>	
<b>Email</b>	



	Y/N	By (name/role)	Date	Comments
Has a member of PPS staff carried out a pre-placement visit to the setting?				
Has the young person been actively involved in planning for this placement?				
Has the parent/carer been actively involved in planning for this placement?				
Have any other relevant professionals been actively involved in planning for this placement? (e.g., LAC Adviser, EHCP Co, YOT key worker etc.)				
Has a taster session been arranged for the young person?				
Is a member of PPS staff aware of the checks that <b>Ofsted</b> may make when schools commission Alternative Provision?				
Does the AP setting have a website? Has the referrer checked this?				
Does the setting have a social media feed? Has a member of PPS staff checked this for any potential concerns?				
Has the AP setting been inspected? Are reports available?				
Is the school confident that the setting is not operating illegally?				

### SAFEGUARDING

	Y/N	By (name/role)	Date	Comments
Does the AP setting have an appropriate safeguarding policy?				
When a pre-placement visit was carried out, were signing-in procedures appropriate?				
Was information provided about safeguarding leads? (e.g., leaflet, posters, lanyards etc.)				
Who in the AP setting has been trained in safeguarding? When? Is there evidence of training?				
Are staff trained in working with young people with SEND?				

Does a member of PPS staff have assurance that all staff have up to date DBS checks in place?				
What is the AP setting's GDPR policy?				
What is the AP setting's photo consent policy?				
Does the AP setting have an appropriate system for recording safeguarding concerns?				
Does the AP setting have an appropriate system for notifying commissioners/schools of safeguarding issues?				
Does the AP setting have a secure method of storing safeguarding concern forms/files?				
Is there a single central record which includes all staff and volunteers? (See <a href="https://www.gov.uk/government/consultations/keeping-children-safe-in-education">Keeping children safe in education - GOV.UK (www.gov.uk)</a> from paragraph 211)				
Has a member of PPS staff agreed how and when <b>daily</b> attendance/absence will be communicated to the commissioner/school?				
Is the site secure?				
If the site is not secure, have potential risks been addressed?				
Are there post-16 or adults also learning on site at the setting? If so, how is safeguarding for school-age young people being ensured?				
As per KCSIE (2023) subsections 327-328, has the school received written confirmation from the AP that <i>appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that the school would otherwise perform in respect of its own staff</i>				

#### HEALTH AND SAFETY

	Y/N	By (name/role)	Date	Comments
Does the AP setting have adequate insurance? (see below) Can they provide certificates to show this? On				

the certificates, do the amounts covered (£) match those recommended?				
Does the AP setting have an adequate Health and Safety policy?				
Is there an appropriate Risk Assessment template? If not, use sample provided.				
Can the AP setting demonstrate that it has carried out appropriate fire risk assessments?				
Can the AP setting demonstrate that it regularly carries out practice fire evacuation procedures?				
Does the AP setting have a First Aid policy?				
Who are the AP setting's trained First Aiders? How are they identified (e.g., posters, lanyards etc.)?				
Has a member of PPS staff seen evidence of in-date First Aid training certificates?				
If the AP setting involves contact with animals, have all appropriate safety measures been agreed?				
If the AP setting involves the use of machinery and/or tools, has a risk assessment been created?				
If the placement involves the use of machinery/tools, when/how will the young person receive suitable training?				
Will the young person require any special clothing or equipment? If so, who will provide this?				
Is the environment appropriate for the young person? Is it well-maintained?				
If off-site visits or trips form part of the placement, are suitable risk assessments in place?				

**BEHAVIOUR**

	Y/N	By (name/role)	Date	Comments
Does the AP setting have an appropriate behaviour policy/code of conduct?				

Is there a rewards system? Can this be linked to the school's own system?				
Are there any sanctions?				
What is the policy around smoking?				
How does the AP setting demonstrate that behaviour management is strong?				
Are appropriate systems in place for recording and communicating behaviour incidents?				
Does the AP setting have its own behaviour contract/code of conduct which the young person is required to sign?				
Have a member of PPS staff and setting agreed on processes if the placement does not work/is not appropriate?				

## BEHAVIOUR

### PROVISION OFFER

	Y/N	By (name/role)	Date	Comments
Does the school have clear aims and objectives for this AP placement in line with the young person's curriculum?				
Does the school have clear aims and objectives for this AP placement in line with the young person's post-16 plans?				
Will the young person be undertaking any qualifications?				
Can the AP setting provide evidence of a success rate with these qualifications?				
How can the AP setting demonstrate that teaching and learning is of a high standard?				
Has a member of PPS staff carried out a pre-placement baseline assessment which can be reviewed to assess progress?				
Are appropriate progress tracking systems in place?				

Has a member of PPS staff agreed how and when progress at the AP setting will be communicated to the school?				
Have appropriate arrangements been made for transport?				
Have appropriate arrangements been made for snacks and lunches?				
If the young person receives Free School Meals – how will they receive their entitlement?				

### Recommended Levels of Insurance Cover

- Public Liability insurance for a minimum of five-million-pound sterling (£5,000,000) in respect of any one act or occurrence or series of acts or occurrences in any one year
- Employer's Liability insurance for a minimum of ten-million-pound sterling (£10,000,000) in respect of any one act or occurrence or series of acts or occurrences in any one year
- Professional Negligence insurance for a minimum of two-million-pound sterling (£2,000,000) in respect of any one act or occurrence or series of acts or occurrences in any one year
- The Service Provider and its Personnel shall have in place motor vehicle insurance commensurate with the potential liabilities of the Service Provider relating to the operation of vehicles used for the transport of Service User/s and their visitors
- Subcontractor Liability – the Service Provider shall ensure that the same levels of insurance are maintained for any sub-contracted Services

The onus is on the Service Provider to ensure that its insurance policies are always adequate to cover eventualities pertaining to its business, but the school also holds a responsibility to pupils placed there.

### Relevant documentation

- Alternative Provision – Statutory guidance for local authorities - DfE January 2013 (Also applies to *governing bodies and head teachers; state schools; academies; PRUs; AP providers*)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/268940/alternative\\_provision\\_statutory\\_guidance\\_pdf\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/268940/alternative_provision_statutory_guidance_pdf_version.pdf)
- Keeping Children Safe in Education: Statutory guidance for schools and colleges [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/690495/Keeping_children_safe_in_education_-_GOV.UK.pdf)
- Unregistered independent schools and out of school settings – DfE March 2018  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/690495/La\\_Guidance\\_March\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/690495/La_Guidance_March_2018.pdf)