FLANNERY®

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SAFEGUARDING POLICY AND PROCEDURE

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1. Introduction

P. Flannery Plant Hire (Oval) Limited is passionate about safeguarding our learners. "Schools and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children". We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of children, young people and adults at risk of harm in our care, but also a moral duty. This policy focuses on how we recruit and train our staff, support our students and deal effectively with allegations against staff.

The policy will contribute to the protection, safeguarding and promote welfare by:

- clarifying standards of behaviour for staff and students
- promotion of an ethos that promotes mutual respect and shared values
- including safeguarding in a robust pastoral system
- encouraging learners to participate
- alerting staff where there are concerns
- developing staff awareness of the risks and vulnerabilities faced by learners
- addressing concerns at the earliest possible stage
- reducing the potential risks that students face of being exposed to violence, extremism, exploitation, discrimination or victimisation.
- ensuring that on-line safety is promoted within the centres infrastructure through the use of filters and monitoring systems and within pastoral and teaching programmes.

Throughout this policy and procedure, reference is made to "children and young people". The term is used to mean those under the age of 18 years old.
Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.
- Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centered. This means that they should consider, at all times, what is in the best interests of the child.
- Confidentiality: Flannery Plant will follow the guidance document 'Information Sharing: advice for practitioners providing safeguarding services' (DfE, 2018) and the Flannery Data Protection Policy. KCSiE (2019) p22, para 78 states that 'the Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of the children.

We believe that:

- all children/young people have the right to be protected from harm, abuse and neglect;
- that every child has the right to an education and children/young people need to be safe and feel safe in school;
- children/young people need support that meets their individual needs, including those who may have experienced abuse;

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- all children/young people have the right to express their views, feelings and wishes and voice their own values and beliefs;
- all children and young people should be encouraged to respect each other's values and support each other.
- all children/young people have the right to be supported to meet their emotional and social needs as well as their educational needs as this will promote educational achievement;
- Flannery Plant will contribute to the prevention of abuse, victimization, bullying (including homophobic, bi-phobic, trans-phobic and cyberbullying), exploitation, extreme behaviours, discriminatory views and risk taking behaviours.

The Policy will contribute to student support by; identifying and protecting the vulnerable early identification of needs and planning to address those needs.
The policy will contribute to the protection of students by; implementing Child protection policies and procedures and; working in partnership with students, parents / carers and other agencies.
The designated safeguarding lead will ensure that a student's child protection file is transferred to a different educational setting should they move on and the process for doing this.

Reference is also made throughout to "adults at risk of harm". Adults at risk of harm are defined as people aged 18 years old and over who may need or receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation (No Secrets, Department of Health, March 2000). The procedure will be applied with appropriate adaptations to all students.

Reference to and awareness of issues around the safeguarding of looked after children is clear throughout. "The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe".

All staff will be aware of the process for making referrals to Children's social care and for statutory assessments under section 17 (Children in Need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role that they might be expected to play in such assessments.

This policy has been developed with reference to:

- The Children Act 1989. 2004
- The Education Act 2002
- The Prevent Duty for England and Wales (2015) under section 26 of the Counter Terrorism and Security Act 2015
- Section 5B of the Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015)
- Dealing with Allegations of Abuse against Teachers and Other staff (2012)
- Information Sharing (2018)
- The most recent version of Working Together to Safeguard Children (DoE)
- The most recent version of Keeping Children Safe in Education: Statutory Guidance for Schools

2. Governing Body Responsibilities

The Centre Management team at Flannery Plant abide by their responsibilities as outlined in keeping children safe in education. Governors also have specific responsibility for ensuring that the centre monitors the impact of its work and learns lessons from Serious Case Reviews. As stated in Keeping Children Safe in Education (2019), "Governing bodies should ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare".

The Governing Body ensures that the centre:

- provides a safe environment for children, young people and adults at risk of harm to learn in.

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- Identify those who are suffering or are likely to suffer significant harm or who are at risk of radicalisation.
- Take appropriate action to see that students are kept safe at Flannery premises and also that disclosures of potential abuse occurring at home or elsewhere are reported appropriately.
- Report allegations of modern slavery and / or human trafficking in accordance with the Anti-Modern Slavery Statement and Policy.
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures.
- Refer concerns that a child, young person or adult at risk of significant harm or might be at risk of significant harm to the appropriate referral agencies.
- Work effectively with others as required by "Working Together to Safeguard Children".
- Listen to the voice of a child and always act in the interest of the child.
- Appoint a Designated Senior Person for child protection.
- Ensure appropriate safeguarding responses for children who go missing from Flannery premises.
- Have safeguarding policies and procedures that are consistent with the local Safeguarding Children Board requirements, reviewed annually and made available to parents.

The Centre manager and all staff working with children, young people and adults at risk of harm will receive adequate training to familiarise them with their safeguarding roles and responsibilities. They will be familiar with Flannery procedures and policies and receive refresher training at least every 3 years. A senior member of staff will co-ordinate child protection arrangements and will be the Designated Senior Person (DSP). They will be assisted by a Deputy Designated Person who will support and share responsibility for safeguarding.

The centre nominates a member (normally the SLT) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Management team.

The Nominated person for child protection is responsible for liaising with the Centre Manager and Designated Senior Person over matters regarding child protection issues. The role is strategic rather than operational – they will not be involved in concerns about individual students. The nominated governor will receive training relevant to the governance role and this will be updated every two years.

Governing bodies should ensure that their safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the LSCB. This should include understanding and reflecting local protocols for assessment and the LSCB's threshold document along with supplying information as requested by the LSCB.
As part of meeting a child's needs, it is important for governing bodies and proprietors to recognise the importance of information sharing between professionals and local agencies.

3. Types of Abuse and Neglect

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. All centre staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

3.1.1 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. Children may be abused in a family or in an institutional or community setting by those known to them or more rarely, by others (for example via the internet). They may be abused by an adult or adults or another child or children.

3.1.2 Physical Abuse: a form of abuse which 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.

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3.1.3 Emotional Abuse: emotional abuse is the persistent emotional maltreatment of a child or adult at risk of harm such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying) causing children frequently to feel frightened or in danger or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

3.1.4 Sexual Abuse: Sexual abuse involves forcing or enticing a child, young person or adult at risk of harm to take part in sexual activities. It may not necessarily involve a high level of violence, whether or not the child or adult may not be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at or in the production of sexual images, watching sexual activities, 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. Woman can also commit acts of sexual abuse, as can other children.

3.1.5 Neglect: Neglect is the 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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer 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
It may also be neglect of or unresponsiveness to a child's basic emotional needs. This also applies to adults at risk of harm for whom neglect is an often under-reported or unchallenged concern.

3.1.6 Forced Marriage: This involves a young person or adult at risk of harm being forced into a marriage against their will.

3.1.7. Exploitation: Child sexual exploitation is a form of child sex 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. (Department of Education March 2017).
Exploitation can occur through the use of technology without the child's immediate recognition. For example, being persuaded to post sexual images on the internet / mobile phones without immediate payment or gain. In all cases, those exploiting the child / young person have power over them by virtue of their age, gender, intellect, physical strength and / or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitive relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/ economic and / or emotional vulnerability. CSE can take a number of forms and Barnardo's has identified three areas:
Inappropriate relationships involving a lone perpetrator who has inappropriate power or control over a young person, whether physical (including domestic abuse), emotional or economic. There is likely to be a significant age gap between the perpetrator and victim. The young person may believe that they are in a loving, equal relationship.
The 'boyfriend' model of exploitation and peer exploitation – the perpetrator befriends and grooms a young person into a 'relationship' and subsequently coerces them to have sex with friends or associates. This includes gang exploitation and peer-on-peer exploitation.
Elements of organised / networked sexual exploitation or trafficking – young people are passed through networks of offenders, possibly between towns and cities, where they may be coerced into sexual activity

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with multiple men. Victims may also be used as agents to recruit other children and young people. Where there are groups of offenders in a network, these should be considered as Organised Crime Groups (OCGs).

3.1.8 Criminal exploitation of children is a geographically widespread from of harm that is a typical feature of county lines criminal activity: drug networks or gangs exploit children and young people to carry drugs and money from urban areas into suburban and rural areas, market and seaside towns. This can also include: knife crime, modern slavery and honour based violence.

Key to identifying potential victims of child criminal exploitation are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Child Criminal exploitation (as with other forms of exploitation), can affect any child or young person (male or female under the age of 18 can affect any vulnerable adult over the age of 18
can be exploitation even if it appears consensual
can involve force and / or enticement based methods of compliance and is often accompanied by violence or threats of violence
can be perpetrated by groups
is typified by some form of power imbalance in favour of those perpetrating the exploitation. The power imbalance can be due to a range of factors; gender, cognitive ability, physical strength, status and access to economic or other resources.

3.1.9 Domestic Violence: The Home Office defines domestic violence as “any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim”.
Children who live in households where domestic violence is taking place are seen to be highly vulnerable. Flannery recognises that exposure to domestic abuse can have serious long term emotional and psychological impacts upon children. We work with key partners and share information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm

3.1.10 Female Genital Mutilation: This comprises all procedures that involve partial or removal of the external female genitalia or other injury to female genital organs for non-medical reasons. FGM is an extremely harmful practice and is illegal in the UK. Despite being an embedded practice in some cultures, FGM is not a matter which can be decided by personal preference.
Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence and they should not be examining pupils, but the same definition of what is meant by “discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.
Teachers have a mandatory duty to report disclosures on FGM about a female under the age of 18, personally to the police. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or Flannery’s designated safeguarding lead and involve children’s social care as appropriate.

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3.1.11 ‘Honour-Based’ Violence: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community and can include multiple perpetrators, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so called HBV are abuse (regardless of motivation) and should be handled and escalated as such.

3.1.12 Radicalisation: Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to Channel which is a multi-agency panel who offer guidance and support with the aim of preventing activity which could be deemed as criminal. Extremism goes beyond terrorism and is defined in the Governments Counter Extremism Strategy as vocal or active opposition to our fundamental values including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. The calls for the death of armed forces is also considered as extremism.

3.1.13 Financial and Material Abuse: This applies largely to adults at risk of harm and relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse or misappropriation of property, possessions or benefits.

3.1.14 Bullying: While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child’s wellbeing and in very rare cases has been a feature in the suicide of some young people. Bullying someone because of their age, race, gender, sexual orientation disability and/or transgender will not be tolerated as Flannery operates a zero-tolerance approach. Bullying can take many forms and includes:

- Emotional
- Being excluded, tormented (e.g. hiding things, threatening gestures)
- Physical
- Pushing kicking, punching or any use of aggression and intimidation
- Racial
- Racial taunts, use of racial symbols, graffiti, gestures
- Sexual
- Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti
- Verbal
- Name calling, spreading rumours, teasing
- Cyber

All areas on internet, such as email and internet, chat room misuse, mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting.

3.1.15 Fabricated and Induced Illness: This is also a type of physical abuse. This is where a child is presented with an illness that is fabricated by the adult carer. The carer may seek out unnecessary medical treatment or investigation. The signs may include a carer exaggerating a real illness or symptoms, complete fabrication of symptoms or inducing physical illness for example through poisoning, starvation, inappropriate diet. This may also be presented through false allegations of abuse or encouraging the child to appear disabled or ill to obtain unnecessary treatment or specialist support.

3.1.16 Private Fostering: Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not a parent or close relative. This is a private arrangement made between a parent and a carer, for 28 days or more. The Children Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership).

Although local authorities are charged with several duties, including the implementation of measures designed to strengthen private fostering notification arrangements, raising awareness of private fostering across partner agencies, ensuring that relevant training practices are developed, reviewing the findings of

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the annual private fostering report and responding to the findings of OFSTED inspections, all partner agencies of the LSCB, parents and private foster parents have a responsibility and duty to:
ensure that privately fostered children are protected.
raise awareness of private fostering and the need to notify the local authority of arrangements.
ensure that private fostering arrangements are satisfactory and compliant with legislation.
ensure that the private foster parents are suitable and that appropriate advice is being given.
consider post 16 support for those who are no longer subject to private fostering due to their age.
In a private fostering placement, the responsibility for safeguarding and promoting the welfare of the child stays with the parent. Local authorities of LSCBs do not approve or register private foster parents. Placement cannot be prevented unless the person is disqualified or a prohibition order is imposed. The local authority cannot remove the child except under an Emergency Protection Order.

3.1.17 Culture, Faith and Beliefs: The number of known cases of child abuse linked to accusations of 'possession' or 'witchcraft' is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem. It is likely that a proportion of this type of abuse remains unreported.
Such abuse generally occurs when a carer views a child as being 'different', attributes this difference to the child being 'possessed' or involved in 'witchcraft' and attempts to exorcise him or her. A child could be viewed as 'different' for a variety of reasons such as disobedience, independence, bed-wetting, nightmares, illness or disability. There is often a weak bond of attachment between the carer and the child. There are various social reasons that make a child more vulnerable to an accusation of 'possession' or 'witchcraft'. These include family stress and/or a change in the family structure.
The attempt to 'exorcise' may involve severe beating, burning, starvation, cutting or stabbing and isolation and usually occurs in the household where the child lives.
Any siblings or other children in the household may be well cared for with all their needs met by the parents and carers. The other children may have been drawn in by the adults to view the child as 'different' and may have been encouraged to participate in the adult activities.
Concerns reported in the cases known from research have involved children aged 2-14, both boys and girls and have generally been reported through schools or non-governmental organisations. The referrals usually take place at a point when the situation has escalated and become visible outside the family. This means that the child may have been subjected to serious harm for a period of time already.
The initial concerns referred have been about: issues of neglect such as not being fed properly or being 'fasted', not being clothed, washed properly etc. but left to fend for themselves, especially compared to the other children in the household. Often the carer is not the natural parent and the family structure can be complex. Children often appear distressed or withdrawn.
The child is seen as the scapegoat for a change in family circumstances for the worse.
In a group of children, it may be the child who is relatively powerless vis-à-vis the parents/carers, may be a child with no essential role in the family.
The child is seen as someone who violates the family homes by being physically different perhaps because of illness, disability or, in some cases, a suspicion by the father of adultery by the mother.
Child abuse linked to faith or belief may occur where a child is treated as a scapegoat for perceived failure.

3.1.18 Multiple Needs: Research shows that the environment in which a child lives is crucial to his or her health, safety and well-being.
The term 'Toxic Trio' has been used to describe the issues of domestic abuse, mental ill-health and substance misuse which have been identified as common features of families where harm to children has occurred. They are viewed as indicators of increased risk of harm to children and young people.
Work in this area has shown that there is a large overlap between these parental risk factors and cases of child death, serious injury and generally poorer outcomes for children across all ages (Brandon et al, 2008).
Experiencing serious, multiple disadvantage cuts across many domains and family life and families with multiple and complex needs are likely to have difficulties meeting the needs of their children and parenting effectively. Children can be at heightened risk of abuse and neglect (Cleaver et al 2007) and at high risk of adverse outcomes.
Given the predominance of families experiencing multiple and complex difficulties who become involved with child protection and the range of social and economic issues that interact with presenting problems

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such as mental health concerns, family violence and substance abuse. The challenge for child protection is how to provide a holistic and contextual response to the needs of the whole family.

3.1.19 Peer on Peer Abuse: All staff should recognise that children are capable of abusing their peers. All staff should be clear about the policy and procedure for managing allegations and how the victim, perpetrator and any other child affected by this will be supported. The different forms peer on peer abuse can take include:

- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexting (otherwise known as youth produces sexual imagery)
- initiating/hazing type violence and rituals
- This behaviour will never be tolerated, abuse is abuse and should not be tolerated or passed off "banter", "just having a laugh" or "part of growing up"

3.1.20 Sexual Violence and Sexual Harassment
It is important that Flannery staff are aware of sexual violence and the fact that this can, and sometimes does happen. When referring to sexual violence this is a reference to the sexual offences under the Sexual Offences Act 2003:
Rape – A person (A) commits an offence of rape if: there is intentional penetration of the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents
Assault by penetration – A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of his / her body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents
Sexual assault – A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
It should be acknowledged that there are students of different ages, including adults, who will require different considerations and referral may need to be made via different referral routes.

Sexual Harassment, means 'unwanted conduct of a sexual nature' that can occur online or off-line. This is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualized environment.
This can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualized names;
- sexual jokes or taunting;
- physical behaviour such as brushing against someone, interfering with someone's clothes (sexual violence should be considered here along with the experience of the victim), displaying pictures photo's or drawings of a sexual nature; and
- online sexual harassment, this may be standalone or part of a wider pattern of sexual harassment and/or sexual violence and may include;
- Non-consensual sharing of sexual images and videos
- Sexualised online bullying
- Unwanted sexual comments and messages
- Sexual exploitation, coercion or threats
- 'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

There will be a risk and needs assessment carried out for: the victim, the perpetrator and any other children involved and kept under review. Disclosures will be referred in line with Local Authority procedures. (Sexual Violence and sexual Harassment between children in schools and Flannery's D of E December 2017).

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3.1.21 Homelessness
Being homeless or being at risk of homelessness presents a real risk to children's welfare and can place the child at risk of harm from a variety of sources including exploitation. It should be recognized that some 16 and 17 year olds could be living independently from their parents or guardians through exclusion from the family home.
Referral to Children's services is required as they are the lead agency for these young people.
LGBGT+ learners.
Some learners may be vulnerable due to their sexual orientation or gender identity, either, because they have been subjected to homophobic, bi-phobic or transphobic bullying, or because of negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide or homelessness.
Several studies also evidence that LGBGT+ young people may be at increased risk of becoming victims of CSE.
It is important that Flannery is aware of increased risk factors to enable access to the appropriate support for these young people when required.

4. Designated Staff with Responsibility for Protection from Abuse
In all cases where allegations are made against people who may constitute part of the children's workforce, the centre will consult with the Local Authority Designated Officer (LADO). S/He will offer advice regarding appropriate next steps in relation to referral and investigation and ensure that all cases are handled in accordance with safeguarding procedures. Designated staff will have on-going communications with the LADO as part of their safeguarding responsibilities to ensure that centre Policies and Procedures are effective and meet the requirements of current legislation.
Members of centre staff, including volunteers are people who are in positions of trust and therefore any behaviour which may call that position into question will be communicated to the centre and acted upon.

Senior staff member with Lead Responsibility: the designated senior member of staff with lead responsibility for safeguarding and child protection is Aaron Davis, Head of Skills and Training.

The designated senior person is responsible for ensuring that Cases of suspected abuse or allegations are appropriately referred to relevant agencies.
Identify children who may benefit from 'early help' – acknowledging that any child may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

Staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health care plan)
- is a young carer
- is frequently missing / goes missing from care or home
- is using drugs or alcohol
- is in a family circumstance presenting challenges for the child such as substance abuse, adult mental health problems or domestic abuse; and/or has returned home to their family from care.

In the first instance staff should always discuss early help requirements with the designated safeguarding lead (or deputy). Staff may be required to support other agencies and professionals in an early help assessment.
Early help includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
If early help is appropriate, the designated safeguarding lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.
If early help and/or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.
Advice and support to staff on issues relating to safeguarding is provided.
A record of any safeguarding referral, complaint or concern is kept (even where that concern does not lead to a referral).

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Parents/carers, employers of children, young people or adults at risk of harm within Flannery Plant have access to the Flannery's Safeguarding Policy.
There is liaison with secondary schools which send pupils to Flannery to ensure that appropriate arrangements are made for the pupils, to work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Flannery Plant should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct or to consider whether to conduct a section 17 or a section 47 assessment.
Staff receive basic training in safeguarding issues and are aware of Flannery's safeguarding procedures and safer recruitment practices that are in place.

Flannery works with appropriate partners to safeguard children, young people and adults at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. (Information Sharing – advice for practitioners providing safeguarding services to children, young people, parents and carers. July 2018 HM Government)

There is liaison with the nominated Governor and Principal as appropriate.
In addition to their formal training, their knowledge and skills should be updated (for example, via e-bulletins, meeting other designated safeguarding leads or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with developments relevant to the role.
The designated senior person will ensure an annual report is provided to Flannery's Senior Management Team setting out how Flannery Plant has discharged its duties.

The deputy designated person(s) is/are appropriately trained and, in the absence of the designated person, carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the designated person, the deputy will assume all of the functions above.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.
During term time, the designated safeguarding lead and or a deputy should always be available (during Flannery hours) for staff at Flannery's to discuss any safeguarding concerns. Flannery will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Designated members of staff with responsibility for child and adult protection issues are:
Aaron Davis - Designated Safeguarding Lead
HR Manager - Deputy Designated Safeguarding Person

5. Staff Training
All staff members should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members should receive safeguarding and child protection updates (via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
Governing bodies should ensure that all staff members undergo safeguarding and child protection training at induction. The training should be regularly updated. Induction and training should be in line with advice from the LSCB.

6. Safeguarding Students who are Vulnerable to Radicalisation
Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and adults at risk of harm from violent extremist ideologies. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

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The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make the children, young people and adults at risk of harm vulnerable to future manipulation and exploitation. Flannery is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of Flannery's safeguarding duty.

With effect from July 2015 in accordance with the Counter Terrorism and Security Act, Flannery has a responsibility to prevent people from being drawn into terrorism. Prevent is a strand of the Government counter terrorism strategy – CONTEST. The UK faces a range of terrorist threats. The Prevent Strategy aims to:
Respond to the ideological challenge of terrorism and aspects of extremism and the threat faced from those who promote these views.
Provide practical help to stop people from being drawn into terrorism and ensure they are given appropriate advice and support.
Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet, social media and health.

Flannery is required to identify a Prevent Single point of contact (SPOC) who will be the lead within the organization for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism. This will normally be the Designated Senior Person. The SPOC for Flannery Plant is Aaron Davis (Head of Skills and Training).

Flannery staff will be alerted to changes in a student's behaviour or attitude which could indicate that they are in need of help or protection.
When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC.

7. Safeguarding Students who are Vulnerable to Exploitation, Forced Marriage, Female Genital Mutilation or Trafficking
The Safeguarding Policy above and Flannery's values and ethos provide the basic platform to ensure children, young people and adults at risk of harm are given the support to respect themselves and others and protect each other.
Flannery keeps updated on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
Staff are supported and trained to recognise warning signs and symptoms in relation to specific issues and include such issues in their curriculum.
Our safeguarding team knows where to get advice as necessary.

Reporting of Female Genital Mutilation (FGM) –
With effect from October 2015, centres are subject to mandatory reporting in respect of FGM. If a member of staff discovers that an act of FGM appears to have been carried out on a girl aged under 18, that member of staff has a statutory duty to report it to the Police.
When a member of staff has reasons to suspect that an act of FGM has been carried out on a student s/he will discuss the situation with the Designated Safeguarding Lead who may consult relevant agencies before a decision is made whether the mandatory reporting duty applies.

8. Children who go Missing from Education
A child going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect which may include child sexual exploitation, child criminal exploitation, mental health problems, substance abuse and other issues. Early identification and intervention is necessary to identify any underlying safeguarding risk and to help prevent future episodes.
Flannery will hold a minimum of 2 emergency contact numbers for each student. It is good practice to have sufficient contact details to enable a responsible adult to be contacted where concerns have been identified during the Flannery open day.

Local authority reporting guidelines will be followed where a child is missing from education or is removed from the Flannery roll.

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Flannery will demonstrate that reasonable enquiries to ascertain the whereabouts of children will have been taken when there is an attendance / believed missing issue.
Students who have Communication Difficulties
Students with additional learning needs will be supported to be able to disclose issues using a communication method of their choice (for example, signers, communication boards).
Those people supporting the student will be subject to confidentiality requirements.

Children with Special Educational Needs and disabilities (SEND) can face additional safeguarding challenges. Additional support will be made available for this group of students.
Additional barriers can exist when recognizing abuse and neglect in this group of students. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying – without showing any signs;
- Communication barriers and difficulties in overcoming these barriers.
- Being more prone to peer group isolation then other children.

11. Contextual Safeguarding
Safeguarding incidents and/or behaviours can be associated with factors outside Flannery and / or can occur between children outside Flannery. Staff should consider the context within which such incidents and / or behaviours occur. Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety or welfare. Children's social care assessments should consider such factors so it is important that Flannery provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. (Contextual Safeguarding – An overview of the operational, strategic and conceptual framework. Carlene Firmin November 2017).

12. Children Looked After (previously Looked After Children)
The most common reason for children becoming looked after is as a result of abuse / neglect. Staff should have the skills, knowledge and understanding to keep looked after children safe. Staff need information in relation to a looked after child's legal status (whether they are looked after under voluntary arrangements or with the consent of parents or on and interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Information should be available on care arrangements and the level of authority delegated to the carer by the authority looking after him/her.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. It is important that all agencies work together and that prompt action is taken.

The designated teacher for students who are looked after will work with local authorities to promote the educational achievement of looked after children, this will include those who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside of England and Wales. At Flannery Plant the Designated Teacher is Aaron Davis. The designated teacher will work with the virtual school head where appropriate.

13. Care Leavers
The designated safeguarding lead will have details of the local authority Personal Advisor appointed to help and guide the care leaver and liaise with them when there are issues of concern.

14. Children with Family Members in Prison
Approximately 200,000 have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

15. Positive mental health promotion
Positive mental health is important for every member of the Flannery community and we recognise that educational establishments play a key role in this. Flannery wants to develop the emotional well-being and

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resilience of all learners and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors that increase an individual's level of vulnerability and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual's life, the more supportive interventions are required to support and build resilience. It is vital that we work in partnership with parents to support the well-being of our learners.

SAFEGUARDING PROCEDURE

How to deal with Suspicions/Concerns of Abuse or Neglect

Wherever possible there should be a conversation with the Designated Safeguarding Lead (or deputy), who will help staff decide what to do next. This MUST be recorded in writing as soon as possible following any conversation.

Options include:

- Managing support internally via Flannery's own pastoral processes;
- Early help assessment; or
- A referral for statutory services, for example as the child is in need or suffering or likely to suffer harm.

IF IN EXCEPTIONAL CIRCUMSTANCES, THE DESIGNATED SAFEGUARDING LEAD (OR DEPUTY) IS NOT AVAILABLE, THIS SHOULD NOT DELAY APPROPRIATE ACTION BEING TAKEN.

Where a child is suffering, or is likely to suffer from harm, concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. MASH or the child's social worker if there is already an open case to social care.

Key things to remember if a child, young person or adult at risk of harm tells you about possible abuse:

- Never promise confidentiality – you will have to break it and with it the person's trust in you.
- Listen carefully and stay calm – you need to listen without making assumptions or judgments.
- Do not interview the child, young person or adult at risk of harm. Question normally and without pressure and only to be sure that you understand what you have heard. Never ask leading questions or act as an investigator. Do not put words into their mouth.
- Reassure them that by telling you, they have done the right thing.
- Inform them that you must pass the information on, but that only those that need to know about it will be told. Inform them of whom you will report the matter to.
- Find out what the child, young person or adult at risk of harm would like to happen, but make them aware that you may have to act against their wishes (eg they may ask you not to disclose to anyone else).
- Note the main points carefully.
- Use the Safeguard system to report, if possible, to gather key information and as a record of your discussion.
- Do not investigate concerns or allegations yourself, but report them immediately to a member of the safeguarding team.

At no time should an individual teacher / member of staff consider taking photographic evidence of any injuries or marks to a child's person, this type of behaviour could lead to the staff member being taken into managing allegations procedures

Procedure for Students

There are slightly different procedures to follow for different types of student:

Under 18 years old on programmes at main sites (students 16-17 years old).

Under 16 years old on any school linked programmes.

Under 16s who are on part time programmes that are not attached to a school – EHE.

Apprentices

Under 18 year olds at Flannery premises, who are not enrolled as students – e.g. work placements.

Adults at risk of harm: IF IN DOUBT – ALWAYS CONTACT A MEMBER OF THE

1. SAFEGUARDING TEAM.

1.3 Under 16 Year Olds on any Secondary School Roll

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1.3.1 The Centre Manager will liaise with the schools concerned and ensure appropriate arrangements are in place to safeguard children.
1.3.2 The referral must go back to the safeguarding coordinator at the school they normally attend to discuss the referral and agree actions.
1.3.3 This should not delay appropriate action being taken where there is risk of harm
1.4 Students 16-17 Years Old
Where a student aged under 18 years old divulges information or staff become concerned that the young person is at risk of abuse, the following action will be taken:
1.4.1 Staff will advise the student that action may have to be taken as a result of the disclosure. It is not the responsibility of members of staff to investigate suspected abuse.
1.4.2 A written record of the interview will be made where possible.
1.4.3 Referral to a member of the safeguarding team will be made immediately and in person where possible.
1.4.4 Students' wishes regarding actin to be taken will be noted where possible. However, the student will be made aware that this will not affect the final decision to make a referral.
1.4.5 There is no need to involve other members of staff (including line managers) as this reduces confidentiality.
1.4.6 Make the student aware of the services within Flannery's which may be able to help them address the situation and offer support.
1.4.7 Where possible the safeguarding Manager will consult the student regarding the report and their wishes and inform them of action which has or will be taken. However, depending upon the circumstance, this may not always be possible.
1.4.8 Confidential records will be kept of all discussions relating to protection from abuse matters and will be stored in a confidential manner.
1.5 Apprentices
1.5.1 Workplace providers still receive a copy of the Safeguarding Policy and Procedure and information relating to their responsibility for safeguarding.
1.5.2 Placement officers/Assessors will carry out all risk assessments and include safeguarding discussion as part of workplace reviews with students.
1.5.3 Apprentices will receive information relating to safe practice in the workplace and safeguarding contact details.
1.5.4 When dealing with disclosure, follow referral procedure for 1.4.1 to 1.4.8 for students aged 16-17 years old or adult at risk of harm (1.6) dependent upon their age.
1.6 Adults at Risk of Harm
1.6.1 Members of staff hearing allegations follow the procedure for 16-17 year olds. Do not promise confidentiality and explain what might happen as a result of disclosure.
1.6.2 The adult has a right to make their own decisions if they are competent to do so in line with the Mental Capacity Act 2005. If their competency is in doubt, contact a member of the safeguarding team for advice.
1.6.3 If appropriate, further advice will be sought or a referral will be made.
1.6.4 A report of the disclosure and any action must be recorded and the safeguarding and the Centre Manager informed.

STUDENT SERVICES SAFEGUARDING PROCEDURE FLOWCHART
Under 16s
(14-16 programme tasters)
16 – 17s
Adult at Risk of Harm
Apprentices
Do Not Promise Confidentiality
Do Not Promise Confidentiality
Listen
Do not ask questions
Make notes if possible
Find out what they want to happen
Tell them what you will do next
Offer reassurance and support

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Contact member of Safeguarding Team
Follow internal procedure for dealing with safeguarding concerns
Records stored centrally in a confidential manner
Listen
Follow procedure as per 16-17s
As an adult there is a right to choose what happens next
Contact a member of the Safeguarding Team
Contact for advice re competence to make informed choice or referral

2 Reporting and Dealing with Allegations of Abuse against Members of Staff
The procedures apply to all staff, whether teaching, administrative, management or support. Allegations of abuse against a member of staff can be defined as when a person has:
Behaved in a way that has harmed or may have harmed a child, young person or adult at risk of harm.
Possibly committed a criminal offence against or related to a child, young person or adult at risk of harm.
Behaved towards a child, young person or adult at risk of harm in a way that indicated s/he is unsuitable to work with children, young people or adults at risk of harm.

2.1 Introduction
2.1.1 Flannery recognises that the welfare of the child is the paramount concern.
2.1.2 Flannery recognises that an allegation of child abuse or abuse to adults at risk of harm made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.
2.1.3 All staff are advised that they must report worries or concerns about other members of staff through the Whistleblowing Policy.

2.2 Receiving an Allegation from a Child or Adult at Risk of Harm about a Member of Staff
2.2.1 A member of staff who receives an allegation about another member of staff from a child or adult at risk of harm will follow the guidelines in Section 1 for dealing with disclosure. This will ensure the child/adult needs are met.
On some occasions the concern may not arise from a direct disclosure. If observations of staff behaviour give rise for concern of inappropriateness, these must be shared directly with the Designated Senior Person.
2.2.2 The allegation about the staff member will be reported immediately to either the Designated Senior Person or a member of Flannery Executive/Senior Management Team (CE/SMT).
2.2.3 They will contact the Local Authority Designated Officer (LADO) for children under 18 or the Adult Safeguarding unit for adults at risk of harm to discuss referral and action. The LADO will be contacted within 1 working day of receiving the allegation.
Appropriate internal action will be taken to safeguard the child/vulnerable adult.
The Centre Manager will inform the SLT (or designated person if the allegation is against the Manager) and they will provide details including information about times, dates, location and names of potential witnesses where appropriate or necessary.
2.3 Initial Assessment by the Principal (or designated person)
2.3.1 The Principal (or designated person) will make an initial assessment of the allegation, consulting with the LADO, Head of Safeguarding and Wellbeing and the Designated Governor as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the student has suffered, is suffering or is likely to suffer significant harm, the matter will be dealt with under the relevant safeguarding children procedures or in the case of adult abuse, the Adult Safeguarding Unit.
2.3.2 It is important that the Centre Manager (or designated person) does not investigate the allegation. The initial assessment will be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.
2.3.3 Other potential outcomes are:
The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child or adult at risk of harm. The matter will be addressed through professional development of mentoring or in some cases more appropriate, Flannery's Disciplinary Policy and Procedure.

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The allegation can be shown to be false because the facts alleged could not possibly be true, in which case the person concerned will be reassured and supported as appropriate.

2.4 Enquiries and Investigations

2.4.1 Child/Adult protection enquiries by Children's Social Care, Adult Services or the Police are not to be confused with internal, disciplinary enquiries by Flannery.
Neither the Child Protection Agencies nor the Police have power to direct Flannery to act in a particular way; however, Flannery will always assist the agencies with their enquiries.
2.4.2 Flannery will hold in abeyance its internal enquiries which the formal Police or Children's Social Care or ASU investigation. Any internal enquiries will conform to the existing staff disciplinary procedures.
2.4.3 If there is an investigation by an external agency, for example, the Police, the Principal (or designated person) will normally be involved in and contribute to the inter-agency strategy discussions. The Centre manager (or designated person) is responsible for ensuring that Flannery gives every assistance with the agency's enquiries. They will ensure that the appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Centre Manager (or designated person) shall advise the member of staff that s/he may consult with a recognized Trade Union representative or work companion.
2.4.4 Following discussion with the LADO, the ASU manager, the Police or other investigating agency, the Centre manager (or designated person) shall:
ensure that the parents/carers of the child or vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve.
inform the member of staff against whom the allegation was made of the fact that the allegation was made. Where investigation is taking place, they will be informed of what the likely process will involve and what support may be available.
inform the Designated manager of the allegation if action is required and of the investigation.
2.4.5 Written records of the action taken in connection with the allegation will be kept.

2.5 Suspension of Staff

2.5.1 Suspension will not be automatic; a member of staff may be suspended on full pay whilst an investigation is undertaken. In respect of staff other than the Centre Manager, suspension can only be carried out by the Centre Manager or a designated member of Flannery's Management team. In respect of the Centre Manager, suspension can only be carried out by the SLT.
2.5.2 Where a suspension is being considered it is not a disciplinary sanction and does not involve any pre judgment. Consideration will be given to alternatives – e.g. paid leave of absence, agreement to refrain from attending work, change of or withdrawal from specified duties.
2.5.3 Suspension will only occur for a good reason, for example:
Where there is a cause to suspect a child or adult is at risk of significant harm.
Where the allegations warrant investigation by the Police or potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
Where necessary for the good and efficient conduct of the investigation.
2.5.4 If suspension is being considered, the member of staff will be encouraged to seek advice and support for example from a Trade Union.
2.5.5 Prior to making the decision to suspend, the Centre Manager or a designated member of the Senior Management Team will interview the member of staff. This will occur with the approval of the LADO where possible. In particular, if the Police are engaged in an investigation, the officer in charge of the case will be consulted.
2.5.6 The member of staff will be advised to seek the advice and/or assistance of his/her Trade Union and will be informed that they have the right to be accompanied by a representative of a recognised Trade Union or a workplace colleague. The member of staff will be informed that an allegation has been made. It will be made clear that the interview is not a formal disciplinary hearing but solely for raising a serious matter which may lead to further investigation. It may be considered at this time to suspend the member of staff.
2.5.7 During the interview, the member of staff will be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The member of staff will be given the opportunity to consider any information given to him/her at the meeting and prepare a response.

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2.5.8 If the Centre manager considers that suspension is necessary, the member of staff shall be informed that s/he is suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible and ideally within five working days.
2.5.9 Where a member of staff is suspended, the Centre Manager will address the following issues:
The SLT will be informed of the suspension
The Governing Body will receive a report if a senior member of staff has been suspended pending investigation. The detail given to the Governing Body will be minimal.
Where the Centre manager has been suspended, the SLT will need to take action to address the management of Flannery.
The parents/carers of the child or adult making the allegation will be informed of the suspension.
2.5.10 Senior staff that need to know of the reason for suspension will be informed.
2.5.11 The Centre Manager shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO and external investigating authorities will be consulted.
2.5.12 The suspended member of staff will be given appropriate support during the period of suspension. They will also be provided with information on progress and developments in the case at regular intervals with approval of LADO and the police.
2.5.13 The suspension will remain under review in accordance with Flannery's Disciplinary Procedures.
2.5.14 Where suspension is instigated and or something that could result in dismissal for misconduct which harmed a child or placed a child at risk, Flannery will refer them to the Disclosure and Barring Service (DBS). Referral to DBS also applies to action taken in relation to adults at risk of harm.
2.5.15 Where an individual is dismissed for misconduct which harmed a child or placed a child at risk of harm or resigns, retires, is made redundant or is transferred to a position which is not a child care position in such circumstances, Flannery has a statutory duty to refer to the DBS.
2.5.16 if a person is subject to registration or regulation by a professional body or regulator, for example, by the Health and Care Professions Council, OFSTED etc., the LADO will advise on whether a referral to that body is appropriate.
2.5.17 if it is decided that a member of staff who has been suspended from work can return, Flannery will facilitate their return to work and consider how the member of staff's contract with the child or children who made the allegation can be best managed. The DBS will be notified that the suspension has been lifted.

2.6 The Disciplinary Investigation
2.6.1 The disciplinary investigation will be conducted in accordance with the existing Disciplinary Policy and Procedure.
2.6.2 The member of staff will be informed of:
The disciplinary allegation against him/her
His/her entitlement to be represented by a Trade Union representative or work companion.
Flannery's awareness of the personal impact the allegation may have and the support Flannery is able to offer for example, counselling.
2.6.3 Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension will be lifted immediately and arrangements made for the member of staff to return to work.
2.6.4 The child, children or adult at risk of harm, making the allegation, and/or parent will be informed of the outcome of the investigation and proceedings.

2.7 Allegations without Foundation
2.7.1 False allegations may be indicative of problems of abuse elsewhere. A record will be kept and consideration given to a referral to Children's Services, Social Care in order that other agencies may act upon the information.
2.7.2 In consultation with the Designated Senior Person or designated Governor, the Principal shall:
Inform the member of staff against whom the allegation is made orally and in writing that no further action will be taken.
Reassure them of Flannery's understanding of the personal impact that false allegations may have and the support Flannery will continue to offer.
Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
Where the allegation was made by a child/adult at risk of harm other than the alleged victim, consideration to be given to informing the parents/carers of that child/adult at risk of harm.
Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

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Records
2.8.1 Documents relating to an investigation will be retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details will be retained on the member of staff's personal and confidential file.
2.8.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, s/he will be informed about Flannery's statutory duty to inform the DBS.

Recruitment and Selection
2.9.1 Flannery aims to recruit and develop skilled and motivated staff who will deliver an outstanding service to the local community. An effective recruitment and selection process is a major contributor to this aim. Flannery is committed to safeguarding and promoting the welfare of children and adults at the risk of harm and expect its staff to share this commitment.
2.9.2 The Disclosure and Barring Service (DBS) was introduced on 1 December 2012 through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedom Act 2012. Its purpose is to reduce the risk of harm to children and vulnerable adults.
2.9.4 The barred list checks are an additional safeguarding check and part of a wider framework of safer recruitment practices. It enables the increased monitoring and review of criminal record related information and intelligence. It does not remove the need for DBS disclosures, nor does it remove the need to develop and apply robust recruitment procedures, including identity checking, qualifications and references and enquiring into career history.
2.9.5 The Safeguarding Children and Safer Recruitment in Education Guidance recommends that in addition to the various staff records which are kept as part of normal business, Flannery must also keep and maintain a single central record of recruitment and vetting checks. Flannery's Single Central Record (SCR) is run and stored with Human Resources.

3 Safer Recruitment Training
3.1 All staff who participate in the recruitment process are required by Flannery to undergo recruitment and selection process training. In addition, every interview panel must have at least one member who has received safer Recruitment Training. Both are arranged by Human Resources.
Refresher training is available and all staff will be expected to keep themselves up to date with current practice.
3.2 Whilst it is a criminal offence to knowingly employ someone who is barred from working with children or adults at risk of harm in regulated activity, it is possible to allow such a person to work in controlled activity, subject to specific safeguards being in place.
The decision whether to employ in controlled activity someone who is barred from working with children or adults at risk of harm in regulated activity will be made after Human Resources completes the appropriate risk assessment form and consults with the Centre manager.
If the applicant has already declared on their application form or during interview that they are barred from working in regulated activity, or the subsequent pre-employment checks reveal this to be the case, the individual must not be allowed to start employment until the decision has been made. To do so, is a criminal offence.
3.3 Recruitment and Selection Process – Flannery's Safer Recruitment and Selection process applies to all staff and volunteers who may work with children, young people and adults at risk of harm.
Vacancies are advertised widely in order to ensure a diversity of applicants and make clear the requirements for DBS checks. The post or role will be clearly defined and the job offers will be made subject to satisfactory completion of pre-employment checks which include:
receipt of two satisfactory written references provided by past employers, one of which must be from the present or most recent employer.
verification of identity and the provision of original documentation as required by the DBS.
DBS checks are sought an appointment and updated every 3 years as appropriate.
a clear check against the DBS Barred Children's List, if applicants are working in regulated activity.
a variety of selection techniques (for example, qualifications, previous experience and interview are also used).
Flannery's interview process includes a specific question relating to safeguarding.
If previously non-disclosed and criminal/police information is identified by the DBS disclosure, a member of Human Resources will discuss this with the person seeking the position, before discussing with the Principal, to determine whether withdrawing the conditional offer of employment is necessary.

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For overseas appointees, additional checks will be made against criminal records information from countries where the individual has lived or worked.
If a candidate is to be employed in regulated activity, but is not currently working, checks will be made, including a full reference, with the School, FE College or Local Authority at which they were most recently employed, to confirm details of their employment and reason for leaving and if there were any safeguarding issues. All required checks will be held by the Human Resources Department in a Single Central Record (SCR).

4. Staff Training
New staff will receive training during induction. All staff, including the Centre Manager will receive training that is updated at least every three years and the DSP will receive training updated at least every two years, including training in the inter-agency procedures.

5. Site Security
Visitors to Flannery premises including contractors, are required to sign in and given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe Flannery's Safeguarding and Health and Safety regulations to ensure children at Flannery's are kept safe.

6. Extended Flannery and Off Site Arrangements
Where extended Flannery activities are provided by and managed, our own Child Protection Policy and Procedures apply. If other organisations provide services or activities on our site, we will check that they have appropriate procedures in place, including safer recruitment procedures.
When students attend off-site activities, including day and residential visits and work –related activities, we will check that effective child protection arrangements are in place.

8. Photography and Images
To protect students, we will:
Seek their consent for photographs to be taken or published (for example, on our website or in newspapers and publications).
Ensure students are appropriately dressed.
Encourage students to tell us if they are worried about any photographs that are taken of them.

9. Online Safety
Cyber-bullying by students, via texts, emails, sexting and sharing indecent images will be treated as seriously as any other type of bullying and will be managed through Flannery's Bullying and Harassment procedures.
Chat rooms and social networking sites are more obvious sources of inappropriate and harmful behaviour. Any inappropriate behaviour towards other students attending Flannery's will be managed through the disciplinary procedure.
As Flannery increasingly works online, it is essential that students are safeguarded from potentially harmful and inappropriate online material. As such, appropriate filters and monitoring systems are in place.
Flannery has a whole Flannery approach to online safety which includes a clear policy on the use of mobile technology at Flannery's. It is acknowledged, however, that whilst it is essential to ensure that appropriate filters and monitoring systems are in place, it is also important that 'over blocking' does not lead to unreasonable restrictions s to what children/students can be taught with regards to online teaching and safeguarding.
Flannery will ensure that online safety is included in lessons and students are taught about safeguarding, including online, through teaching and learning opportunities, as part of a broad and balanced curriculum. This may include covering relevant issues through tutorials.

APPENDIX 1
GUIDANCE ON PREVENT AND THE CHANNEL PROGRAMME

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What is Prevent?
Prevent is the Government's strategy to stop people becoming involved in violent extremism or supporting terrorism, in all its forms. Prevent works within the non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours.

What is Channel?
Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour, Chanel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

What does Channel Work with?
Channel is designed to work individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.

How does Channel Work?
Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed.
The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensure those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

What does Channel Support look like?
Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary
activities such as sport. Each support package is tailored to the person and their particular circumstances.

How will the person be involved in this process?
A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Who can make a referral?
Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services.

What happens with the Referral?
Referrals are first screened for suitability through a preliminary assessment by the Channel coordinator and the local authority, if suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.

Raising a Concern
If you believe that someone is vulnerable to being exploited or radicalized, please use the established safeguarding duty or care procedures within your organisation to escalate your concerns to the appropriate leads, who can raise concerns to Channel if appropriate
For referrals to Channel for more information around the process, in the first instance contact your local Prevent Coordinator.
If you don't have a local authority coordinator or would like specific FE.HE guidance, please contact: john.hodt@dudley.gov.uk or Telephone: 01384 81473

The Channel Process within Flannery's
SEXUAL BEHAVIOUR TRAFFIC LIGHT TOOL 13 to 17 years Green behaviours • solitary masturbation • sexually explicit conversations with peers • obscenities and jokes within the current cultural norm • interest in erotica/pornography • use of internet/e-media to chat online • having sexual or non-sexual relationships • sexual activity including hugging, kissing, holding hands • consenting oral and/or penetrative sex with

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others of the same or opposite gender who are of similar age and developmental ability • choosing not to be sexually active

What is green behaviour?
Green behaviours reflect safe and healthy sexual development. They are: • displayed between children or young people of similar age or developmental ability • reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?
Green behaviours provide opportunities to give positive feedback and additional information. Amber behaviours • accessing exploitative or violent pornography • uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing • concern about body image • Taking and sending naked or sexually provocative images of self or others • single occurrence of peeping, exposing, mooning or obscene gestures • giving out contact details online • joining adult- only social networking sites and giving false personal information • arranging a face to face meeting with an online contact alone

What is amber behaviour?
Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be: • unusual for that particular child or young person • of potential concern due to age, or developmental differences • of potential concern due to activity type, frequency, duration or context in which they occur •

What can you do?
Amber behaviours signal the need to take notice and gather information to assess the appropriate action. Red behaviours • exposing genitals or masturbating in public • preoccupation with sex, which interferes with daily function • sexual degradation/humiliation of self or others • attempting/forcing others to expose genitals • sexually aggressive/exploitative behaviour • sexually explicit talk with younger children • sexual harassment • non-consensual sexual activity • use of/acceptance of power and control in sexual relationships • genital injury to self or others • sexual contact with others where there is a big difference in age or ability • sexual activity with someone in authority and in a position of trust • sexual activity with family members • involvement in sexual exploitation and/or trafficking • sexual contact with animals • receipt of gifts or money in exchange for sex

What is red behaviour?
Red behaviours are outside of safe and healthy behaviour. They may be: • excessive, secretive, compulsive, coercive, degrading or threatening • involving significant age, developmental, or power differences • of concern due to the activity type, frequency, duration or the context in which they occur
What can you do? Red behaviours indicate a need for immediate intervention and action.

APPENDIX 2
Covid-19
The department has also published guidance on implementing protective measures in education and childcare settings to support this.
https://www.gov.uk/government/publications/coronavirus-covid-19-implementing-protective-measures-in-education-and-childcare-settings

Keeping Children Safe in Education (KCSIE) is statutory safeguarding guidance that schools and Flannery should continue to have regard to as required by legislation.
This addendum of Flannery's Safeguarding Policy contains details of safeguarding arrangements listed below:

1. Staff and volunteers able to identify any new safeguarding concerns about individual children as they see them in person following Flannery closure.
2. Staff and volunteers understand Flannery's process if they have any concerns about a child and are able to act immediately.
3. Staff and volunteers keep themselves updated with continuing safeguarding updates and new guidance and are aware that Flannery's safeguarding arrangements may be subject to change,

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therefore should make themselves aware of potential new procedures during unprecedented times.

4. Outline, where resources allow, that DSLs (and deputies) will have more time to support staff and children regarding new concerns (and referrals as appropriate) as more learners return.
5. Ensure that relevant safeguarding and welfare information held on all learners (including returning learners) remains accurate. Schools and Flannery (led by the DSL or deputy) should be doing all they reasonably can to ask parents and carers to advise them of any changes regarding welfare, health and wellbeing that they should be aware of before a learner returns.
6. Flannery has a clear reporting process for parents/carers/employers to inform staff and volunteers that their child/learner/employee has suspected symptoms of Covid-19 or feels unwell. Staff will support parents/carers following the advice set out by Public Health England.
7. The aim is to have a trained DSL (or deputy) available on site. Where this is not the case, a trained DSL (or deputy) will be available to contact via phone or online video - for example when working remotely.
8. Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site. This might include updating and managing access to child protection online management system (Safeguard) and liaising with the offsite DSL (or deputy) and as required; liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or Flannery. It is important that all staff and volunteers have access to a trained DSL (or deputy). On each day, staff on site will be made aware of that person, and how to speak to them. The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be remotely. Processes may be revised for managing any reports of peer-on-peer abuse and support victims (the principles as set out in part 5 of KCSIE should continue to inform any revised approach). Flannery Plant will listen and work with the young person, parents/carers and any multiagency partner required ensuring the safety and security of that young person. Concerns and actions must be recorded on Flannery's safeguarding systems and appropriate referrals made.
9. Process for Domestic Abuse/Domestic Violence should continue as in the safeguarding policy.
10. Staff and volunteers should understand Flannery's procedure if they have concerns about a staff member or volunteer who may pose a safeguarding risk to children (the principles in part 4 of KCSIE will continue to support how a school or Flannery responds to any such concerns).
11. Vulnerable children for the purposes of continued attendance during the coronavirus outbreak are those who:

- are assessed as being in need under section 17 of the Children Act 1989, including children who have a child in need plan, a child protection plan or who are a looked-after child.
- have an education, health and care (EHC) plan and it is determined, following risk assessment (risk assessment guidance), that their needs can be as safely or more safely met in the educational environment.
- have been assessed as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from attendance. This might include young people on the edge of receiving support from children's social care services, adopted children, those at risk of becoming NEET ('not in employment, education or training'), those living in temporary accommodation, those who are young carers and others at the provider and local authority's discretion.
- Read more in the guidance on vulnerable children and young people.

12. Arrangements are in place to keep learners who are not physically attending Flannery's safe, particularly online, and how concerns about these children are reported.
13. Flannery is committed to ensuring the safety and wellbeing of all its students. Flannery will continue to be a safe space for all learners to attend and flourish in line with implementing protective measures guidance and follow advice from Public Health England on sanitation, social distancing and other measures to limit the risk of spread of Covid-19.

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Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site. This might include updating and managing access to child protection online management system (Safeguard) and liaising with the offsite DSL (or deputy) and as required; liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or Flannery. It is important that all staff and volunteers have access to a trained DSL (or deputy). On each day, staff on site will be made aware of that person, and how to speak to them. The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be remotely. Processes may be revised for managing any reports of peer-on-peer abuse and support victims (the principles as set out in part 5 of KCSIE should continue to inform any revised approach). Flannery will listen and work with the young person, parents/carers and any multiagency partner required ensuring the safety and security of that young person. Concerns and actions must be recorded on Flannery safeguarding systems and appropriate referrals made.

14. Flannery is committed to ensuring the safety and wellbeing of all its young people. Where the DSL/ Deputy has identified a child to be on the edge of social care support, or who would normally receive support in Flannery they should ensure that a robust communication plan remains in place for that young person.
    Details of this plan must be recorded on the Flannery safeguarding system, as should a record of all contacts made. Communication plans can include; remote contact, phone contact. Other individualised contact methods should be considered and recorded.
    Flannery and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan. Plans must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.
    Flannery recognises that it is a protective factor for young people, and the current circumstances can affect the mental health of learners and their parents/carers. Staff at Flannery need to be aware of this in setting expectations of the learner's work when they are at home.
15. Learners and Online Safety away from Flannery- Staff and volunteers should be aware of the clear reporting routes for children to raise any concerns whilst working online and are able to signpost learners to appropriate practical support from:
    - Childline - for support
    - UK Safer Internet Centre - to report and remove harmful online content
    - CEOP - for advice on making a report about online abuse

    Flannery will ensure that all staff who interact with learners, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the safeguarding policy and where appropriate referrals should continue to be made to children's social care and as required the police.
    Remote Education - guidance on safeguarding and remote education to support schools and Flannery's plan lessons safely.

Virtual Lessons and Live Streaming - There is an expectation that teachers may have to live stream or provide pre-recorded videos. Flannery should consider the approaches that best suit the needs of their children and staff.
https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19?utm_source=cc90fb4d-85d1-4c41-837a-dd29a3eccbc2&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

16. Online Safety in Schools/Flannery- All staff and volunteers should continue to consider the safety of their children when they are asked to work online. Online teaching "dos and don'ts" continue as set out in Flannery's staff code of conduct and should be followed. This includes acceptable use of technologies, staff /student relationships and communication including the use of social media.

Flannery will ensure that appropriate filters and monitoring systems are in place to protect learners when they are online on Flannery's IT systems. The policy should apply equally to any existing or new online and distance learning arrangements, which are introduced. Any use of online learning tools and systems will comply with privacy and data protection requirements.
Staff and volunteers should be in regular contact with parents and carers. Those communications should continue to be used to reinforce the importance of learners being safe online. It will be especially

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important for parents and carers to be aware of what their children / young person is being asked to do online, including the sites they will be asked to access and be clear which members of staff (if anyone) their child is going to be interacting with online.

Support for parents:

- Thinkuknow provides advice from the National Crime Agency (NCA) on staying safe online
- Parent info is a collaboration between Parentzone and the NCA providing support and guidance for parents from leading experts and organisations
- Childnet offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- Internet Matters provides age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- London Grid for Learning has support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- Net-aware has support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- Let's Talk About It has advice for parents and carers to keep children safe from online radicalisation
- UK Safer Internet Centre has tips, advice, guides and other resources to help keep children safe online, including parental controls offered by home internet providers and safety tools on social networks and other online services
- support for parents and carers to keep children safe from online harms, includes advice about specific harms such as online child sexual abuse, sexting, and cyberbullying support to stay safe online includes security and privacy settings, blocking unsuitable content, and parental controls

17. Flannery will continue to work with local safeguarding partners and receive any updated advice. DSLs (or deputies) should be leading Flannery's input into the local arrangements.
18. Flannery will work with and receive any updated advice from local authorities regarding children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need.
19. Staff to work with and support learners social workers, the local authority virtual school head for looked-after and previously looked-after children and any other relevant safeguarding and welfare partners.
    Where staff are concerned about an adult working with children at Flannery', they should report the concern to the Centre Manager. If there is a requirement to make a notification to the Centre Manager whilst away from Flannery's, this should be verbally, and then followed up with an email to the Centre Manager. Managing allegations process should be followed in the usual way.
    Flannery will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the Local Authority Virtual School Heads (VSH) for looked-after and previously looked-after children.

Reporting a concern - Where staff have a concern about a child, they should continue to follow the process outlined in Flannery's Safeguarding Policy; this includes making a report via the safeguarding system, which can be undertaken remotely. Staff are reminded of the need to report any concern immediately.

Implementation and Review

This Procedure is effective from 2nd January 2023 and will be reviewed in line with CITB updates and requirements. Overall implementation of this process lies with Aaron Davis (Head of Skills and Training).

Signed:

A.Davis, Head of Skills and Training, 02.01.23

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