

# FREEDOM FOUNDATION SAFEGUARDING POLICY

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01 POLICY STATEMENT

This policy applies to the Directors, paid staff and volunteers, or anyone working on behalf of Freedom Foundation.

Freedom Foundation staff and/or volunteers understand the importance of robust safeguarding and child protection processes and how this can impact a child or young person. We understand that those who work with children or young people can identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. All staff have a responsibility to provide a safe environment in which children can learn.

Freedom Foundation understands that as an organisation who works with children and young people, we are part of the wider safeguarding system for children. This system is described in the statutory guidance as Working Together to Safeguard Children 2023.

02 PURPOSE

To protect children\* and young adults who receive Freedom Foundation's services.

\* 'Children' refers to anyone under the age of 18.

To provide Freedom Foundation AP staff and volunteers with the overarching principles that guide our approach to safeguarding and child protection.

Freedom Foundation believes that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to practice in a way that protects them.

## **We recognise that:**

Safeguarding and promoting the welfare of children is everyone's responsibility; in order to convey effective safeguarding everyone has a role to play. Freedom Foundation AP takes on a child centred approach to ensure effectiveness and always considers what is in the best interest for the child

All children have a right to be safe and protected from harm.

Freedom Foundation recognises that abuse happens to adults and children, both male and female and cuts across age, ethnicity, sexual orientation, religious and non-religious beliefs, ability and background.

Freedom Foundation recognises that child on child abuse can happen.

Freedom Foundation recognises that every organisation and individual involved with children and young people has a responsibility for their well-being and protection - a duty of care. We are committed to that shared responsibility and promote effective working to safeguard children.

Freedom Foundation understands that staff are particularly important, as they are able to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

The welfare of the child is paramount, as enshrined in the Children Act 1989.

All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse.

Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

## **02.1 POLICY PROCEDURE**

This policy demonstrates how Freedom Foundation will meet its legal obligations and reassure volunteers, employees, partners and members of the public:

- What they can expect Freedom Foundation to do to protect and safeguard vulnerable people
- That they can safely voice any concerns through an established procedure
- That all reports of abuse or potential abuse are dealt with in a serious and effective manner
- There is an efficient recording and monitoring system in place
- Directors, paid staff, volunteers, subcontracted agencies, and partners receive appropriate induction on safeguarding

- That a robust 'safe' recruitment procedure is in place, in line with Freedom Foundation's Recruitment and Selection Policy, including Safer Recruitment

### 03 WHAT IS SAFEGUARDING?

All Staff have responsibility for making sure this policy is complied with. Please take the time to read and understand it, and to go back to your manager with any questions you may have.

We understand it to mean protecting children from harm that arises from encountering our staff or programmes.

Freedom Foundation understands that no single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action.

Providing help and support to meet the needs of children and young people as soon as problems emerge.

Protecting children and young people from maltreatment inside or outside the home, including online.

Preventing the impairment of children's mental and physical health or development.

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.

Taking action to enable all children to have the best outcomes.

### 04 WHAT TO LOOK OUT FOR

#### 04.1 EARLY HELP

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

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health, and Care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and

association with organised crime groups or county lines

- Is frequently missing/goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools and in Alternative Provision or a Pupil Referral Unit
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse, is misusing alcohol and other drugs themselves
- Is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child

## 04.2 ABUSE, NEGLECT, AND EXPLOITATION

Staff will be made aware of the indicators of abuse, neglect and exploitation through **staff training**. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

**Staff training** will include staff being made aware that abuse, neglect, exploitation. Safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff, especially Freedom Foundations Designated Safeguarding Lead (DSL), and Deputy's will be made aware of how they should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff will be aware **through staff training** that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

All staff **understand through training** that if they are unsure to always contact the Freedom Foundation AP

### 04.3 INDICATORS OF ABUSE AND NEGLECT

Includes children witnessing the ill treatment of others and that this is particularly relevant when children and young people see, hear or experience domestic abuse and its effects. Abuse refers to actions that violate a person's human or civil rights.

**Physical abuse** is defined as when a person is deliberately hurt, causing physical harm.

Physical abuse can involve:

- Hitting
- Kicking
- Throwing
- Shaking
- Poisoning
- Burning
- Suffocating

It is also referred to as physical abuse if a parent or carer makes up or causes the symptoms of illness in children. For example, they may give them medication they don't need, making them unwell. This is known as fabricated or induced illness (FII).

**Emotional Abuse** is defined as a type of abuse that involves the use of words and actions to control, manipulate, and intimidate another person. Emotional abuse can be just as harmful as physical abuse, and it can have a devastating impact on a person's mental and emotional health.

Emotional abuse can involve:

- Humiliating, putting down or regularly criticising a child
- Shouting at or threatening a child or calling them names
- Mocking a child or making them perform degrading acts
- Constantly blaming or scapegoating a child for things which are not their fault
- Trying to control a child's life and not recognising their individuality
- Not allowing a child to have friends or develop socially
- Pushing a child too hard or not recognising their limitations
- Manipulating a child

- Exposing a child to distressing events or interactions
- Persistently ignoring a child
- Being cold and emotionally unavailable during interactions with a child
- Not being positive or encouraging to a child or praising their achievements and successes

**Neglect** is defined as not meeting a child's or person's basic or physical and/or psychological needs. This can result in serious damage to their health and development.

Neglect may involve a parent/carer not:

- Providing adequate food, clothing or shelter
- Supervising a child or keeping them safe from harm or danger (including leaving them with unsuitable carers)
- Making sure the child receives appropriate health and/or dental care
- Making sure the child receives a suitable education
- Meeting the child's basic emotional needs – this is known as emotional neglect.

Neglect is the most common type of child abuse. It often happens at the same time as other types of abuse.

Resources to help recognise neglect:

[Child and young person's neglect toolkit: for assisting in the identification of child neglect](#)

The toolkit should be used in conjunction with the local pathway documents which provide guidance on threshold for services, and the [interagency procedures and guidance](#).

[Nottingham City](#)

[Nottinghamshire County](#)

[Derby and Derbyshire](#)

**Sexual Abuse** is defined as forcing or enticing a person or child to take part in sexual activities. It doesn't necessarily involve violence, and the person or child may not be aware that what is happening is abuse. Sexual abuse can involve contact abuse and non-contact abuse. Contact abuse happens when the abuser makes physical contact with the person or child.

Sexual abuse includes:

- Sexual touching of any part of the body whether the person or child is wearing clothes or not
- Rape or penetration by putting an object or body part inside a person or child's mouth, vagina or anus

- Forcing or encouraging a person or child to take part in sexual activity
- Making a person or child take their clothes off or touch someone else's genitals
- Non-contact abuse involves non-touching activities. It can happen online or in person and can include:
  - Encouraging or forcing a person or child to watch or hear sexual acts
  - Making a person or child masturbate while others watch
  - Not taking proper measures to prevent a person or child being exposed to sexual activities by others
  - Showing pornography to a person or child
  - Making, viewing or distributing child abuse images
  - Allowing someone else to make, view or distribute child abuse images
  - Meeting a child following online sexual grooming with the intent of abusing them

Resources for Harmful Sexual Behaviour:

The National Society for the Prevention of Cruelty to Children (NSPCC) provides free and independent advice about [harmful sexual behaviour or peer-on-peer sexual abuse](#).

The Lucy Faithful Foundation has developed a [harmful sexual behaviour \(HSB\) toolkit](#) which, amongst other things, provides support, advice and information on how to prevent HSB. The toolkit includes links to organisations and helplines, resources about HSB by children, internet safety, sexual development, and preventing child sexual abuse.

Contextual Safeguarding Network provides a school self-assessment [toolkit](#) and guidance for addressing SB in schools.

Abusers will often try to build an emotional connection with a child in order to gain their trust for the purposes of sexual abuse. This is known as grooming.

#### 04.4 CHILD CRIMINAL EXPLOITATION (CCE) AND CHILD SEXUAL EXPLOITATION (CSE)

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

#### 04.5 CHILD CRIMINAL EXPLOITATION (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or



manipulated into committing vehicle crime or threatening/committing serious violence to other children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation

#### 04.6 CHILD SEXUAL EXPLOITATION (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

### 05 LEGAL FRAMEWORK

This policy has been drawn up based on law and guidance that seeks to protect children namely:

- [Children Act 1989](#)
- [United Conventions of the Rights of the Child 1991](#)
- [Data Protection Act 1998](#)
- [Human Rights Act 1998](#)
- [Sexual Offences Act 2003](#)
- [Children Act 2004](#)
- [Safeguarding Vulnerable Groups Act 2006](#)

- [Protection of Freedoms Act 2012](#)
- [Children and Families Act 2014](#)
- [HM Courts and Tribunals Service](#)
- [Working Together to Safeguard Children 2023](#)
- [Keeping Children Safe in Education \(DfE 2024\)](#)
- [Early Years Foundation Stage Statutory Framework](#)
- [Guidance for Schools and Colleges \(gender questioning children DfE 2024 under review\)](#)

## 06 SCOPE

This policy is mandatory for all Freedom Foundation AP staff. For the purposes of this policy, 'staff' is defined as anyone who works for or on behalf of Freedom Foundation, either in a paid or unpaid capacity. This therefore includes directly employed staff, freelance staff, agency staff, directors, patrons and employees

It also covers implementing partners whom we work with under the policy as a condition of their involvement with Freedom Foundation.

This policy demonstrates how Freedom Foundation AP will meet its legal obligations and reassure staff, volunteers, partners, and members of the public:

- What they can expect Freedom Foundation to do to protect and safeguard vulnerable people.
- That they can safely voice any concerns through an established procedure
- That all reports of abuse or potential abuse, neglect or exploitation are dealt with in a serious and effective manner.
- There is an efficient recording and monitoring system in place.
- Directors, paid staff, volunteers, subcontracted agencies, and partners receive appropriate inductions on safeguarding.
- That a robust 'safe' recruitment procedure is in place.

Freedom Foundation will respond to all concerns about the safety and well-being of a child at risk. We will take action to prevent the abuse, harm, neglect or exploitation of others and reduce the risk of harm from abuse. We will work collaboratively with other agencies to improve outcomes for individuals.

Freedom Foundation will ensure its workers are **inducted and trained in** safeguarding procedures, their individual responsibilities, information sharing and taking prompt action.

This includes:

- Child protection policy - including the policy and procedures to deal with child-on-child abuse
- Safeguarding and child protection training including online safety with a clear understanding of their roles and responsibilities in relation to filtering and monitoring
- Behaviour policy which includes measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Code of conduct including low-level concerns, allegations against staff and whistleblowing
- Safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- Role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)

**Part one (or Annex A, if appropriate) and Annex B of [Keeping Children Safe in Education](#) MUST be read by all Freedom Foundation staff and/or volunteers as part of their induction process.**

All Freedom Foundation staff/volunteers will be regularly updated on changes to legislation including safeguarding and child protection via team meetings, emails will be sent out with details of the changes. **Staff must read and sign a declaration form to state that they have read and understood the changes in legislation, this will be kept on file and SCR.**

All staff/volunteers will attend yearly in-house refresher training; this will enable them to provide the relevant skills and knowledge to safeguard children effectively.

Freedom Foundation will ensure all workers are supported with their safeguarding responsibilities through debriefing, supervision, team meetings and appraisal procedures.

Freedom Foundation staff will be aware of and understand their role within the local early help process

Freedom Foundation will ensure safe recruitment, selection and vetting of employees, and self-employed individuals working within the organisation. We are aware of the requirements of the Disclosure and Barring

Service (DBS). Check levels will depend on the specific role of the applicant and whether they will have direct contact with children/young people.

In line with the Freedom Foundation Recruitment and Selection Policy

Freedom Foundation are committed to Safer Recruitment practices to keep colleagues, stakeholders and young people safe at all times.

Safer Recruitment Practices:

- Applicants are asked to declare any criminal convictions or cautions at application stage and all candidates must produce a clear enhanced Disclosure and Barring Service (DBS) check dated within 3 years. If a candidate does not have a current enhanced DBS, then Freedom Foundation completes this process, and it must be satisfactory in order to offer any work.
- If an enhanced DBS shows any cause for concern, then this will be discussed with the candidate **and if** applicable, referred to the Disclosure and Barring Service immediately
- All Freedom Foundation staff and facilitators are provided with training that is appropriate to their role.

For more information, please refer to the Freedom Foundation Recruitment and Selection Policy.

Freedom Foundation will ensure an effective, accurate and up to date record keeping of safeguarding concerns.

Freedom Foundation will ensure records are protected and confidentiality is upheld unless the need to take appropriate action overrides the usual rules of confidentiality.

## **08 RESPONSIBILITIES FOR SAFEGUARDING WITHIN FREEDOM FOUNDATION**

### **08.1 ALL PEOPLE WORKING WITH FREEDOM FOUNDATION WILL:**

- a. Read, review, and adhere to the Freedom Foundation Safeguarding Policy and Freedom Foundation Code of Conduct.
- b. Attend an induction that includes details of safeguarding and child protection legislation
- c.** Attend staff training – this will help all staff have an understanding and awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and

semi-nude images and/or videos can be signs that children are at risk. **Details of safeguarding issues all staff should be aware of are located below in 'Policy Overview' (section 25) of this document.**

- d. Strive to promote a zero-tolerance approach to discrimination, sexual harassment, and abuse in all working environments.
- e. Provide a safe environment in which children can learn.
- f. Be prepared to identify children who 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.
- g. Be aware of the process of making referrals to local authority children's social care and for statutory assessments under the [Children Act 1989](#), especially 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 they might be expected to play in such assessments.
- h. Know what to do if a child tells them they are being abused, exploited, or neglected. **Staff will be trained in how to manage the requirement to maintain an appropriate level of confidentiality.** This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and local authority children's social care. All staff will be made aware in training that we never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- i. Be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. All staff understand that a victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.
- j. All staff will be made **aware through training** that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having professional curiosity and speaking to the designated safeguarding lead if they have concerns about a child. It is also important that staff determine how best to build trusted relationships which facilitate communication with children and young people.
- k. Strive to develop relationships with all stakeholders which are based on equality, trust, respect, and honesty.
- l. Place the safety and welfare of children and vulnerable people above all other considerations.

- m. Report any concerns they may have about the welfare of a child or vulnerable person and follow the processes set out in Appendix 1. Staff should expect to support social workers and other agencies following any referral.
- n. Report any concerns they may have regarding bullying and harassment in line with our Bullying and Harassment Policy.
- o. Report any concerns they may have about the behaviour of a Freedom Foundation representative in relation to safeguarding.
- p. In a one-to-one situation with a child or young person, where privacy and confidentiality are important, try to make sure that another adult knows the contact is taking place and why. If possible, ensure another adult is in sight and that the child or young person knows another adult is around.

Freedom Foundation AP Staff will be alert to the need for early help for a child who:

- Is frequently missing/ goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools and in alternative provision or a pupil referral unit
- Has a parent/carer in custody or is affected by parental offending.

Detailed information on statutory assessments can be found in [Working Together to Safeguard Children](#)

## **08.2 ALL PEOPLE WORKING WITH FREEDOM FOUNDATION WILL NOT:**

- Sexually harass, assault, or abuse another person
- Physically harass, bully, assault, or abuse another person
- Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate, belittle or degrade
- Condone, or participate in behaviour, which is abusive, discriminatory, illegal, or unsafe
- Develop, encourage, or fail to act on relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative, or abusive
- Act in ways that may be violent, inappropriate, or sexually provocative
- Agree with a child to keep a secret which has implications for their safety or the safety of other young people.

The Head of Provision is responsible for ensuring paid staff, volunteers, consultants, visitors, and partner organisations are aware of the policy and are supported to implement and work in accordance with it, as well as creating a culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

## **09 DESIGNATED SAFEGUARDING LEAD - HELD BY THE FREEDOM FOUNDATION FOUNDER**

The role and responsibilities of the Designated Safeguarding Lead are to:

- Ensure that the policy and procedure are relevant and up to date
- Ensure all workers are trained adequately in safeguarding policy and practice including [Working Together to Safeguard Children](#) and [Keeping Children Safe in Education](#)
- Ensure all safeguarding concerns have appropriate follow-up action taken and are resolved, recorded and filed securely
- Provide advice and guidance on safeguarding issues, support staff to carry out their safeguarding duties and liaise closely with other services such as local authority children's social care.

Safeguarding Team consists of:

- Designated Safeguarding Lead (DSL)
- Founders
- Lead Facilitators
- Mentor

Information and contact details of Freedom Foundation DSLs can be found in section 16 'Safeguarding Contacts'.

### **09.1 ROLE AND RESPONSIBILITIES OF THE SAFEGUARDING TEAM**

The roles and responsibilities of the safeguarding team are to:

- Have a good and up to date understanding of Freedom Foundation's safeguarding policy, procedure, guidance and associated local and national guidance and practice
- Maintain knowledge of local safeguarding procedures and share information as appropriate with other workers
- Be familiar with local safeguarding updates and training opportunities

- Ensure safeguarding concerns have appropriate follow-up action taken and are resolved in partnership with the home school DSL
- Ensure a consistent response to safeguarding issues across the organisation and in partnership with the home school DSL
- Where the home school is unable to make a referral to social care in a timely manner Freedom Foundation will ensure a referral is made to social care should a concern mean a child at risk is considered to be, at risk of significant harm or is considered a child in need

## 10 RESPONDING TO CONCERNS ABOUT A CHILD'S WELFARE

Key points to remember for any member of staff (including volunteers or agency staff) or visitors whenever they have any concerns about a child's welfare:

- In an emergency take the action necessary to help the child, for example, call 999
- Do not assume a colleague or another professional will share information that might be critical to keeping a child safe. Early information sharing is vital in keeping children safe, whether this is when problems first emerge, or when a child is already known to local authority children's social care.
- Report your concern, including any possible private fostering arrangements, to Freedom Foundation's designated safeguarding lead or their deputy as soon as you can and by the end of the day at the latest. Verbal communication regarding all concerns will be had with the home school DSL and reports shared.
- If you are unsure speak to the onsite designated safeguarding lead, the DSL will communicate concerns with the Home School's DSL
- If the DSL or their deputy is not around, ensure the information is shared with the most senior person in the AP that day. The concerns and any action taken must then be shared with the designated safeguarding lead as soon as it is possible.
- If the concerns are about sharing nudes and semi-nudes do not view, copy, print or share the images
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends, or family
- As soon as you are able, complete a record of the concerns. This should be on the same day and before the child is due to leave the school premises on hard copy of reporting forms if supply (see Appendix 1: Example Concerns Form)



- Seek support for yourself if you are distressed from a member of the safeguarding team or a senior colleague who will listen and signpost to external support if required.

Staff must always immediately inform the designated safeguarding lead or their deputy if there are any:

- Concerns that a child is presenting signs or symptoms of abuse, exploitation, or neglect, including suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- Searching incidents where there are reasonable grounds to suspect a learner was in possession of a prohibited item or where a search has revealed a safeguarding risk
- Behaviour or changes in presentation, including changes in school attendance, which gives rise to suspicions that a child may not be receiving adequate care or may be suffering harm
- Hint or disclosure of abuse about or by a child
- Concerns that a person(s) who may pose a risk to children is living in a household with children present
- Concerns about online abuse including cybercrime, exploitation, harmful sexual behaviour, sharing nudes and semi nudes and/or where any adult appears to be sexual communicating (e.g., email, text, written note or verbally) with a child
- Concerns about child-on-child abuse, including sexual violence and harassment
- Information which indicates that the child is living with someone who does not have parental responsibility for them (this is known as private fostering)
- Concerns that a child is at risk of domestic abuse or so-called 'honour-based' abuse, including forced marriage, marriage, or civil partnership under the age of 18, female genital mutilation (FGM), breast ironing, virginity testing or hymenoplasty
- Concerns that a child is at risk of radicalisation, child sexual exploitation or criminal exploitation, including county lines; or that a child or their parent/carer may be a victim of modern slavery (trafficked)

There will also be occasions when you suspect that a child may be at risk, but you have no 'real' evidence or that the child may need support with their mental health. The child's behaviour, play and or appearance may have changed, their attendance at school may have reduced, their ability to concentrate and focus may have altered, or you may have noticed other behavioural and or physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

It is not the responsibility of Freedom Foundation AP staff to determine the truth of any disclosure or allegation; this is the responsibility of local authority children's social care. All staff however have a duty to recognise where extra support is needed or where there are complex needs or child protection concerns requiring intensive or

specialist support.

AP staff will ensure they record these early concerns and follow the protocols to adequacy record and store concern. If a child or adult does begin to reveal that a child is being harmed, you should follow the advice in the section 'If a child chooses to tell a member of staff about a concern or abuse'.

## 11. CHILD DISCLOSURE

### 11.1 IF A CHILD DECIDES TO TELL A MEMBER OF STAFF ABOUT A CONCERN OR ABUSE

It takes a lot of courage for a child, parent, carer, or other significant adult to disclose that they are worried or have concerns. They may feel ashamed, the abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. It is important they are reassured that they are being taken seriously, and that they will be supported and kept safe. They should not be made to feel they are creating a problem, blamed or ashamed for making a report. Reports, particularly those about sexual violence and harassment, if possible, should be managed with two members of staff present (preferably one being the designated safeguarding lead or a deputy), however this might not be possible in all cases.

If a child or adult talks to you about any risks to a child's safety or well-being you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement.

### 11.2 DURING THE CONVERSATION WITH THE CHILD (OR THEIR PARENT/CARER)

During a conversation with the learner or with their parent/carer, Freedom Foundation AP staff will:

- Allow them to speak freely, listen to what is being said without interruption and without asking leading questions
- Keep questions to a minimum and of an open nature ('TED questions' tell me, explain, describe) i.e., 'can you tell me what happened?' rather than 'did x hit you?'
- Remain calm and do not overreact – the child (or their parent/carer) may stop talking if they feel they are upsetting you
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- Avoid admonishing the child or adult for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but they may interpret it that they have done something wrong
- Not be afraid of silences – remember how hard this must be for the child or adult

- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what do other family members think about all this
- At an appropriate time tell the child or adult that to help them you must pass the information on
- Not automatically offer any physical touch as comfort; it may be anything but comforting to a child who has been abused
- Tell the child or adult what will happen next. The child or adult may agree to go with you to see the designated safeguarding lead. Otherwise let them know that someone will come to see or contact them before the end of the day
- Report verbally to the designated safeguarding lead
- Write up your conversation as soon as possible, log it on our system and communicate report to the designated safeguarding lead who will liaise with the Home School DSL regarding the disclosure
- Children should not be asked to write statements about abuse or any concerns that may have happened to them or sign the staff record
- Seek support if they feel distressed; this may be sometime after the disclosure

### 11.3 ROLE OF THE DSL AND THEIR DEPUTY FOLLOWING IDENTIFICATION OF CONCERNS

Whenever the designated safeguarding lead or their deputy receive information regarding concerns about a child, including via police domestic abuse notifications (Stopping Domestic Abuse Together / SDAT) they will:

- Review information received and assess if any urgent actions are needed, i.e. medical, child's immediate safety
- Check what is known about the child when they arrived (or not) at school today, how they are presenting physically and emotionally and if there are any changes in their behaviour
- Consider what is already known about the child and their family, including whether any previous concerns have been raised by staff, home school or if they are already known to local authority children's services. (Freedom Foundation AP will always communicate directly with the Home School DSL or Headteacher where needed)
- Consider what 'checks' need to be carried out and how best these can be achieved (liaise immediately with the home school DSL)
- Inform relevant AP staff who have a specific need to know i.e., Lead Facilitator, mentor and relevant support staff

- Not directly approaching a child or parent/carer about an incident when the school have received a domestic abuse notification (SDAT) and instead make general enquiries with the child about how they are. If a child initiates a conversation about the incident the guidance outlined in the section 'If a child chooses to tell a member of staff about a concern or abuse' will be followed
- Considering whether the matter should be discussed with the child's parents or carers or whether to do so may put the child at further risk of harm. (This decision will be made in partnership with the home school and suitable action decided)
- If the concerns are about radicalisation or violent extremism, contacting the local authority Prevent team for advice and where appropriate communicating with the Home School to ensure a referral to the police Prevent Team is made
- Where the child has complex needs or where there are child protection concerns, communicating with the Home School to ensure a referral as appropriate to Local Authority Children's Services is made
- Notify the Home School of any private fostering arrangements to ensure they contact the appropriate Local Authority Children's Services to allow the local authority to check the arrangement is suitable and safe for the child.
- If a child is at risk of immediate harm, and/or where it is believed a criminal offence has been committed, including sexual violence and harassment, referring to the police.

[NPCC guidance: 'When to Call the Police'](#) is designed to help the DSL understand when they should consider calling the police and what to expect when they do.

#### 11.4 NOTIFYING PARENTS/CARERS

Freedom Foundation AP will normally seek to discuss any needs or concerns about a child with their parents or carers. In situations where there are serious needs or child protection concerns the designated safeguarding lead or deputy will contact the parent/carer, (the Home School will always be informed and consulted in this instance). However, if the setting believes that notifying parents/carers could increase the risk to the child or exacerbate the problem, then the Home School will seek advice from local authority children's social care.

#### 11.5 REFERRAL TO LOCAL AUTHORITY CHILDREN'S SOCIAL CARE (INTENSIVE AND SPECIALIST SUPPORT)

Concerns about a child's welfare will be referred to local authority children's social care using the agreed referral process as outlined in [Derby and Derbyshire Safeguarding Children](#), and in the Multi-Agency Safeguarding Children Hub (MASH) for [Nottingham City](#) and [Nottinghamshire County](#) - Making a referral to Children's Social Care procedures.

If at any point there is a risk of immediate serious harm to a child, an immediate referral should be made to local authority children's social care and/or if appropriate, the police. Anybody can make the referral.

Where it is believed that there are urgent child protection concerns, Freedom Foundation AP designated safeguarding lead or deputy will verbally communicate this with the Home School DSL who will then make a referral to local authority children's social care by phone and follow this up in 'writing' via the local authority Online Referral System. Non-urgent cases will be referred via the local authority Care Online Referral System.

In exceptional circumstances, such as in an emergency or a genuine concern that appropriate action hasn't been taken, any staff member can refer their concerns directly to local authority children's social care; however, they should inform the designated safeguarding lead or deputy as soon as possible.

## 12. FEMALE GENITAL MUTILATION (FGM)

If the referral is about a 'known' case of female genital mutilation (FGM), in addition to a referral to local authority children's social care, individual teacher also has a mandatory reporting duty; see [Mandatory Reporting of Female Genital Mutilation: procedural information \(2015\)](#). Under this duty, 'known' cases of FGM where a girl under 18 informs the person that an act of FGM has been carried out on her, or where physical signs appear to show that an act of FGM was carried out, Freedom Foundation DSL will verbally communicate this with the Home School to ensure that be reported to the police on 101. This is a personal responsibility in addition to the referral to local authority children's social care and the professional who identifies FGM and/or receives the disclosure should make the report by the close of the next working day.

For guidance on FGM concerns, AP staff will utilise the [Multi-Agency Statutory Guidance on Female Genital Mutilation](#) document.

## 13. SOCIAL MEDIA AND CYBERBULLYING

Cyberbullying is the form of bullying that occurs using technology / online, via texts, emails, or social media. At Freedom Foundation AP, we do not allow students to bring mobile phones on site; devices brought to the premises will be placed in the Head of Provisions desk at the beginning of each day and collected at the end of the day. There is no internet use within the premises.

Freedom Foundation AP learning will incorporate the use of social media, cyberbullying and how to be safe online, ensuring that students have an understanding and awareness of online risks and how to minimise them.

For more information on cyberbullying, how Freedom Foundation AP aims to minimise bullying, and advice given to parents/carers of students experiencing cyberbullying, please see our Anti-Bullying policy.

## 14. ACTION FOLLOWING REFERRAL

Freedom Foundation designated safeguarding lead, their deputy or other appropriate member of staff will:

- Ensure that the Home School has followed up the referral in writing using the online referral system within 48 hours and attaching any existing assessment e.g., early help assessment. In all cases the school will

also include information held about any place-based risks (harm outside of the home).

- Be aware that local authority children's social care should make a decision within one working day of the referral being made about what course of action they are taking and let the home school know the outcome. If the information is not forthcoming, Freedom Foundation's designated safeguarding lead or another appropriate member of staff should / will follow this up with the Home School.
- Freedom Foundation's DSL will ensure the Home School maintain contact with the allocated social worker and support them or other agencies following any referral
- Contribute to any strategy discussion or meetings alongside the Home School where appropriate
- Support the home school with any Section 47 enquiries or statutory assessments that are carried out along and where the home school deem appropriate or require support
- Where a child on a Child Protection plan, Child in Need plan, or who is Looked After moves from the school or if there are unexplained absences Freedom Foundation will verbally ask the Home School's DSL to, immediately inform the child's social worker/key worker in local authority children's social care where the home school deem necessary – this request will be followed up in writing
- If after the referral the child's situation does not appear to be improving Freedom Foundations designated safeguarding lead will verbally (followed up in writing) request the Home School press for re-consideration to ensure their concerns have been addressed and the child's situation improves. See [Derby and Derbyshire Multi-Agency Dispute Resolution and Escalation Policy](#) and [Nottingham and Nottinghamshire Escalating for the right Outcome – Conflict Resolution and Professional Disagreement Policy](#).

## 15. CONFIDENTIALITY AND SHARING INFORMATION

Freedom Foundation AP recognises the importance of information sharing between the AP, Home school and local agencies to effectively safeguard our learners.

Freedom Foundation Staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of a child, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (this information will be shared at referral stage).

If in any doubt about sharing information, Freedom Foundation staff should speak to the designated safeguarding lead, who will seek advice from the home school and their Data Protection Officer if needed.

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 children.

All information sharing outside of 'business as usual', should be recorded on the appropriate logs.

Staff should only discuss concerns with the designated safeguarding lead or deputy (or the most senior person on the premises if they are unavailable). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Where there are safeguarding concerns about a child, the home school will be responsible for sharing information with the appropriate organisations such as local authority children's social care under alternative, appropriate, lawful basis. In most cases the home school will discuss concerns with parents and carers prior to the referral taking place unless doing so would increase risk.

## **16. SAFEGUARDING ISSUES ALL STAFF SHOULD BE AWARE OF**

### **16.1 CHILD ON CHILD ABUSE**

All staff are aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online. All staff should be clear as to the school's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff understand that even if there are no reports in their place of work it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most like to include, but may not be limited to:

- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse) which facilitates, threatens and/or encourages sexual violence
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element)

## 16.2 PREVENTING CHILD ON CHILD ABUSE

There is a child centred approach to preventing child-on-child abuse, including child-on-child sexual violence and sexual harassment; this forms part of the child centred approach to safeguarding.

Freedom Foundation AP will seek to minimise the risk of child-on-child abuse by ensuring an approach that prepares learners for life in modern Britain. Freedom Foundation AP has a clear set of values and standards which are upheld and demonstrated throughout all aspects of AP life. There is a child centred approach to preventing child-on-child abuse, including child-on-child sexual violence and sexual harassment, this forms part of the child centred approach to safeguarding. The school will seek to minimise the risk of child-on-child abuse by ensuring an approach that prepares learners for life in modern Britain. Freedom Foundation AP has a clear set of values and standards which are upheld and demonstrated throughout all aspects of school life.

Freedom Foundation AP provides a safe environment, promotes a culture of positive standards of behaviour, takes steps to address inappropriate behaviour, has effective systems in place where children can confidently raise concerns knowing they will be taken seriously and provides safeguarding through the curriculum via topics and themes that explore relationships, online safety, and other curriculum opportunities. This may include targeted work with children identified as vulnerable or being at risk and developing risk assessment and targeted work with those identified as being a potential risk to others.

All staff understand the importance of challenging inappropriate behaviours between peers that are abusive in nature. Downplaying certain behaviours will not be tolerated or passed off. Staff will maintain an attitude of 'it could happen here' and all inappropriate behaviour will be addressed.

The setting deals with a wide continuum of children's behaviour on a day-to-day basis and most cases will be dealt with via Freedom Foundation's AP processes. These are outlined in the following policies:

- Behaviour policy
- Anti-Bullying Policy



- IT and E-Safety Policy
- Attendance policy

### 16.3 ACTION ON CONCERNS

Child-on-child abuse may be a one-off serious incident or an accumulation of incidents. Staff may be able to easily identify some behaviour/s as abusive however in some circumstances it may be less clear. Reports of sexual violence and harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. In all cases the initial response to a report is very important. Members of staff will take the concerns seriously and reassure the child that they will be supported and kept safe, regardless of how long it has taken them to come forward. If possible, reports should be managed with two members of staff present (preferably one being the designated safeguarding lead or a deputy), however this might not be possible in all cases. The victim will not be given the impression they are creating a problem or made to feel ashamed for making a report or their experience minimised. Abuse which has occurred online or outside of the school will be treated just as seriously as that which has occurred within the education environment.

Staff must follow Section 10 'Responding to concerns about a child's welfare' and discuss the concerns and seek advice from the designated safeguarding lead.

When an allegation is made by a pupil/student against another pupil/student, members of staff should consider if the issues raised indicate that the child and/or alleged perpetrator may have low level, emerging needs, complex/serious needs, or child protection concerns and follow the process outlined in Section 10. Responding to concerns about a child's welfare.

Considerations for cases where child-on-child abuse is a factor include:

- What are the wishes of victims in terms of how they want to proceed?
- What is the nature, extent and context of the behaviour including verbal, physical, sexual (including

sharing of nudes/semi-nudes) and/or online abuse? Was there coercion, physical aggression, bullying, bribery or attempts to ensure secrecy? What was the time, location duration, and frequency? Is the incident a one off or a sustained pattern of abuse? (Remember there may be other forms of abuse in addition to what has been reported) Were other children and /or adults involved? Has a crime been committed and/or have any harmfully sexual behaviours been displayed?

- What is the child's age, development, capacity to understand and make decisions (including anything that might have had an impact on this e.g., coercion), and family and social circumstances? What is the nature of the relationship between the children involved? Are they in a current or previous intimate personal relationship, do they live in the same household or setting, attend the same school, classes, or transport?
- What are the relative chronological and developmental ages of the children? Does the victim or perpetrator have a disability or learning difficulty? Are there any differentials in power, social standing, or authority?
- Is the behaviour age appropriate or not? Does it involve inappropriate sexual knowledge or motivation?
- Are there any risks to the child victim or alleged perpetrator themselves and others e.g., other children in school, adult students, school staff, in the child's household (particularly siblings or other children related to the household), extended family, peer group or wider social network? Are there any links to child sexual exploitation, child criminal exploitation or gang related activity?

Immediate consideration should be given to how best to support and protect the victim and alleged perpetrator and any other children involved/impacted. Where the report involves rape and assault by penetration, the alleged perpetrator must be removed from any classes they share with the victim. There must also be careful consideration on how best to keep the victim and alleged perpetrator apart on the premises (including any before or after school activities) and on transport to and from the setting.

For all other reports of sexual violence and sexual harassment and forms of child-on-child abuse, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, school's premises and transport should be considered immediately.

**All decisions will be made by the Home School and in the best interests of the children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator. In all cases, the initial**

report produced by the home School and supported by Freedom Foundation AP (where appropriate) should be carefully evaluated on a case-by-case basis with the designated safeguarding lead taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required. Freedom Foundation's designated safeguarding lead will refer to the Home Schools DSL for guidance and decision making.

## 17. SAFEGUARDING CONTACTS

When appropriate the designated safeguarding lead may seek further advice from local or national safeguarding contacts.

### School Staff with Specific Safeguarding Responsibilities:

Safeguarding Role	Name and Role	School Contact Details
Designated Safeguarding Lead	Laura Grant Director	<a href="mailto:laura.grant@freedomfoundationuk.org">laura.grant@freedomfoundationuk.org</a>
Designated Safeguarding Lead	Simon Green Head of Provision	<a href="mailto:simon.green@freedomfoundationuk.org">simon.green@freedomfoundationuk.org</a>
Designated Safeguarding Lead	Danielle Brown Programmes Coordinator	<a href="mailto:danielle.brown@freedomfoundationuk.org">danielle.brown@freedomfoundationuk.org</a>

### Key Local Safeguarding Contacts (Nottingham/Nottinghamshire):

Contact	Nottingham	Nottinghamshire
Early Help Advice	Visit the Early Help <a href="#">website</a>  <a href="#">Early Help and Family Hub Self-Referral Forms</a>	Early Help Development Team: See Nottinghamshire County Council <a href="#">early help</a> webpage  The Early Help Unit  Tel: 0115 804 1248 Email: <a href="mailto:early.help@nottsc.gov.uk">early.help@nottsc.gov.uk</a>

		The <a href="#">Early Help Unit webpage</a>
<b>Targeted Early Help Requests</b>	<a href="#">Ask Lion – Early Help Services</a>  Referrals can be made via Nottingham City Council MASH team  <b>Tel: 0115 876 4800</b> <b>Email:</b> <a href="mailto:CityMASH@nottinghamcity.gov.uk">CityMASH@nottinghamcity.gov.uk</a>	Early Help Development Team: See Nottinghamshire County Council <a href="#">early help</a> webpage  The Early Help Unit  <b>Tel: 0115 804 1248</b> <b>Email:</b> <a href="mailto:early.help@nottscc.gov.uk">early.help@nottscc.gov.uk</a>
<b>Speak to a Social Worker for thresholds advice and consultation</b>	Multi-Agency Safeguarding Children Hub (MASH)  <b>Urgent: 0115 876 4800</b>  <b>Non-Urgent:</b> <a href="#">Multi Agency Safeguarding Children Hub (MASH) - Nottingham City Council</a>	Nottinghamshire Safeguarding Children Partnership Children's Social Care: <b>Tel: 0300 500 80 80</b> Out of hours emergency duty team: <b>0300 456 4546</b>  MASH Professional consultation line: <b>Tel: 0115 977 4247</b>
<b>Referrals to Local Authority Children's Social Care</b>	Multi-Agency Safeguarding Children Hub (MASH)  <b>Urgent: 0115 876 4800</b>  <b>Non-Urgent:</b> <a href="#">Multi Agency Safeguarding Children Hub (MASH) - Nottingham City Council</a>	Multi-Agency Safeguarding Children Hub (MASH)  <b>Urgent: 0300 500 8090</b>  <b>Non-urgent:</b> <a href="#">Report Concern Online</a>
<b>Local Authority Designated Officer (LADO)</b>	<a href="#">Nottingham City Council LADO</a> to find the referral form  <b>Email:</b> <a href="mailto:LADO@nottinghamcity.gov.uk">LADO@nottinghamcity.gov.uk</a>  City LADO: Caroline Hose <b>Email:</b> <a href="mailto:Caroline.hose@nottinghamcity.gov.uk">Caroline.hose@nottinghamcity.gov.uk</a>	Nottinghamshire Safeguarding Children Partnership LADO  <b>Tel: 0115 804 1272</b>
<b>Local Authority Safeguarding</b>	Claire Maclean  <b>Email:</b>	

Children in Education Officer	<a href="mailto:Claire.maclean@nottinghamcity.gov.uk">Claire.maclean@nottinghamcity.gov.uk</a>	
Nottinghamshire Police	<p><b>999</b> for emergencies or <b>101</b> for non-emergencies</p> <p>Mandatory reporting of Female Genital Mutilation (FGM) via <b>101</b></p> <p>School Police Safer neighbourhood team or link officer:</p> <p>Dunkirk PCSO – Brian Grant and Helen Russell-Taylor  <b>Tel:</b>  <b>Email:</b></p> <p>Sneinton PCSOs – Magdalena Pilarek and Julia Coughill  <b>Email:</b> <a href="mailto:magdalena.pilarek@notts.police.uk">magdalena.pilarek@notts.police.uk</a>  <b>Email:</b> <a href="mailto:Julia.coughill@notts.police.uk">Julia.coughill@notts.police.uk</a></p> <p>Also see: <a href="#">When to call the police – guidance for schools and colleges</a></p>	
Prevent (radicalisation and extremism)	<p>For advice contact the Local Authority Prevent Teams:</p> <p><a href="#">Nottingham City Council Prevent Duty</a> – Mark Pollock (Prevent Coordinator)  <b>Tel:</b> 07977 752 444  <b>Email:</b> <a href="mailto:prevent@nottinghamcity.gov.uk">prevent@nottinghamcity.gov.uk</a></p> <p><a href="#">Nottinghamshire Police Prevent Team</a>  <b>Tel:</b> 101 ext. 800 2962/2963  <b>Email:</b> <a href="mailto:prevent@nottinghamshire.pnn.police.uk">prevent@nottinghamshire.pnn.police.uk</a></p> <p>For more information on Prevent visit: <a href="https://www.gov.uk">GOV.UK website</a></p> <p>Police Prevent (radicalisation/extremism) Team on <b>101</b> or directly via the national police Prevent advice line on <b>0800 011 3764</b>. See 'Make a Referral' on the <a href="#">Nottinghamshire Police Prevent webpage</a> (Nottinghamshire Constabulary)</p> <p>Reporting extremism concerns about an adult working in an education setting submit the details at <a href="#">report extremism in education</a></p> <p><a href="#">Prevent Statutory Guidance</a></p>	
Education Welfare and Local Authority Children Missing Education (CME) Officer	<a href="#">Nottingham Education Welfare Service</a>  CME: 0115 876 2965 or <a href="mailto:CME.EducationWelfare@nottinghamcity.gov.uk">CME.EducationWelfare@nottinghamcity.gov.uk</a>	<p>See Nottinghamshire County Council's: <a href="#">Fair access and children missing education</a></p> <p><b>Tel:</b> 0115 977 3225  <b>Email:</b> <a href="mailto:fairaccess@nottsccl.gov.uk">fairaccess@nottsccl.gov.uk</a></p>

	<b>Education Welfare &amp; EOTAS Service</b> Loxley House Station Street Nottingham NG2 3NG  See <a href="#">Children Missing from Education</a> for more information.	
<b>Virtual School for Looked After Children</b>	Virtual School general enquiries: <b>Tel: 0115 977 4747</b> <b>Email: <a href="mailto:virtual.school@nottsc.gov.uk">virtual.school@nottsc.gov.uk</a></b>  Previously looked after children advice and guidance: <b>Tel: 0115 804 4677</b> <b>Email: <a href="mailto:virtualschooladvice@nottsc.gov.uk">virtualschooladvice@nottsc.gov.uk</a></b>  Children with a social worker advice and guidance: <b>Tel: 0115 804 3275</b> <b>Email: <a href="mailto:virtualschool.cwasw@nottsc.gov.uk">virtualschool.cwasw@nottsc.gov.uk</a></b>  For more information see the Nottinghamshire County Council <a href="#">webpage</a>	
<b>Public Health Nurse / other health contact/s</b>	Please see the <a href="#">CityCare Community Health Services website</a> for specific contact details	Please see the <a href="#">Nottinghamshire Family Directory website</a> for specific contact details about Healthy Family Teams and further information
<b>Domestic Abuse</b>	Nottingham City Council – information and advice about domestic abuse <a href="#">webpage</a>	Nottinghamshire County Council – advice about domestic abuse <a href="#">webpage</a>  Nottinghamshire Police advice about domestic abuse <a href="#">webpage</a>  Ask Lion <a href="#">webpage</a> – advice, information about 24-hour helplines, and information about free & local support (including contact numbers and information)
<b>Harmful Sexual Behaviour Service</b>	Action for Children Pathway Programme Service for harmful sexual behaviours: <a href="mailto:Pathwayservice@actionforchildren.org.uk">Pathwayservice@actionforchildren.org.uk</a>	
<b>Cyberchoices</b>	For children at risk of being drawn into cybercrime via <a href="#">East Midlands Cyber Secure</a>	
<b>Homelessness or risk of</b>	See Nottingham City Council 'Homelessness' <a href="#">webpage</a>	See Nottinghamshire County Council 'Housing' <a href="#">webpage</a>

Key Local Safeguarding Contacts (Derby/Derbyshire):

Contact	Derby	Derbyshire
<b>Early Help Advice</b>	<p>Early Help Advisors</p> <p>Locality 1/5</p> <p>Derwent, Chaddesden, Spondon, Oakwood, Mackworth, Allestree, and Darley</p> <p><b>Email:</b> <a href="mailto:vcm1and5@derby.gov.uk">vcm1and5@derby.gov.uk</a> <b>Tel:</b> 01332 208 175</p>	<p>Early Help Development Team:</p> <p>See DDSCP <a href="#">early help</a> webpage and Derbyshire <a href="#">schoolsnet</a></p>
<b>Targeted Early Help Requests</b>	<p>Locality Vulnerable Children Meeting (VCM) for requests for targeted early help via multi-agency team (MAT) or non-urgent social care referrals via Locality Based Single Point of Access (SPA) Clerks:</p> <p><b>Locality 1 &amp; 5</b> Derwent, Chaddesden, Oakwood, Mackworth, Allestree, and Darley</p> <p><b>Email:</b> <a href="mailto:vcm1and5@derby.gov.uk">vcm1and5@derby.gov.uk</a></p> <p><b>Locality 2</b> Sinfen, Alvaston, Boulton, Chellaston, Osmaston, and Allenton</p> <p><b>Email:</b> <a href="mailto:vcm2@derby.gov.uk">vcm2@derby.gov.uk</a></p> <p><b>Locality 3 &amp; 4</b> Balgreaves, Littleover, Mickleover, Normanton, and Abbey</p> <p><b>Email:</b> <a href="mailto:vcm3and4@derby.gov.uk">vcm3and4@derby.gov.uk</a></p> <p><b>The Light House</b> (Integrated Disabled Children's Services)</p>	<p>Requests for support from professionals should be made via the <a href="#">Starting Point contact and Referral service webpage</a> where the online request for support form can be found, unless a child is at risk of significant harm</p>

	<p><b>Tel: 01332 256 990</b></p> <p><b>Email:</b>  <a href="mailto:VCM-IDCS@derby.gov.uk">VCM-IDCS@derby.gov.uk</a></p>	
<b>Speak to a Social Worker for thresholds advice and consultation</b>	<p>Children's Services Professional Consultation Line:</p> <p><b>07812 300 329</b></p>	<p>Starting point consultation and advice service for professionals:</p> <p><b>01629 535 353</b></p>
<b>Referrals to Local Authority Children's Social Care</b>	<p><b>Initial Response Team</b></p> <p><b>Urgent:</b>  <b>01332 641 172</b>  Or out of hours via Careline  <b>01332 956 606</b></p> <p><b>Non-Urgent:</b>  <a href="#">Derby Children's Social Care Online Referral System</a></p>	<p><b>Starting Point</b></p> <p><b>Urgent:</b>  <b>01629 533 190</b></p> <p><b>Non-Urgent:</b>  <a href="#">Starting Point Online</a></p>
<b>Local Authority Designated Officer (LADO)</b>	<p>Derby and Derbyshire <a href="#">LADO referral form</a></p> <p><b>Email:</b>  <a href="mailto:CPMduty@derby.gov.uk">CPMduty@derby.gov.uk</a></p>	<p>Derby and Derbyshire <a href="#">LADO referral form</a></p> <p><b>Email:</b>  <a href="mailto:professional.allegations@derbys-hire.gov.uk">professional.allegations@derbys-hire.gov.uk</a></p>
<b>Derbyshire Police</b>	<p><b>999</b> for emergencies or <b>101</b> for non-emergencies</p> <p>Mandatory reporting of Female Genital Mutilation (FGM) via <b>101</b></p> <p>School Police Safer neighbourhood team or link officer:  PCSO 12998 Daisy Leverington  Safer Neighbourhood Officer  Allestree SNT  Derbyshire Constabulary  Derby North  St Mary's Wharf  Prime Parkway  DE1 3AB</p> <p><b>Tel: 101</b></p> <p><b>Email:</b> <a href="mailto:daisy.leverington@derbyshire.police.uk">daisy.leverington@derbyshire.police.uk</a></p> <p><b>Web:</b> <a href="http://www.derbyshire.police.uk">http://www.derbyshire.police.uk</a></p>	



	Also see: <a href="#">When to call the police – guidance for schools and colleges</a>	
<b>Prevent</b> (radicalisation and extremism)	<p>For advice contact the Local Authority Prevent Team:</p> <ul style="list-style-type: none"> <li>- <b>Derby:</b> 07765 222 032 or <a href="mailto:sally.siner@derby.gov.uk">sally.siner@derby.gov.uk</a></li> <li>- <b>Derbyshire:</b> 01629 538 473 or <a href="mailto:prevent@derbyshire.gov.uk">prevent@derbyshire.gov.uk</a></li> </ul> <p>Police Prevent (radicalisation/extremism) Team on <b>101</b> or directly via <b>03001 228 694</b>. For emergencies phone <b>999</b>. See 'refer someone to the <a href="#">Derbyshire Prevent Team</a> (Derbyshire Constabulary)</p> <p>Reporting extremism concerns about an adult working in an education setting submit the details at <a href="#">report extremism in education</a></p>	
<b>Education Welfare and Local Authority Children Missing Education (CME) Officer</b>	<a href="#">Derby Education Welfare Service</a>  CME: 01332 641 448 or <a href="mailto:cme@derby.gov.uk">cme@derby.gov.uk</a>  See <a href="#">Children Missing Education</a> for further information and CME referral form and for notification forms for child on roll, removal from roll, and removal from roll to Elective Home Education (EHE)	<a href="#">Derbyshire Education Welfare Services</a>  CME: <a href="mailto:CS.CMECoordinators@derbyshire.gov.uk">CS.CMECoordinators@derbyshire.gov.uk</a>  See <a href="#">Children missing from education</a> for further information on guidance, policies and procedures relating to school age children missing from education
<b>Virtual School for Looked After Children</b>	Virtual School Head: <b>07812 301 044</b> or <a href="mailto:graeme.ferguson@derby.gov.uk">graeme.ferguson@derby.gov.uk</a>	Rachel Moore, Head of the Virtual School for Children in Care: <b>07798 882 876</b> or <a href="mailto:rachel.moore@derbyshire.gov.uk">rachel.moore@derbyshire.gov.uk</a>
<b>Public Health Nurse / other health contact/s</b>	Specialist Public Health Nurse	Gemma Akers <b>07795 688 158</b> <a href="mailto:gemmaakers@nhs.net">gemmaakers@nhs.net</a>
<b>Domestic Abuse</b>	<a href="#">Safer Derby City</a>  Derbyshire constabulary – information and advice about domestic abuse <a href="#">webpages</a>	<a href="#">Safer Derbyshire domestic abuse</a>  Derbyshire constabulary – information and advice about domestic abuse <a href="#">webpages</a>
<b>Harmful Sexual Behaviour Service</b>	Action for Children Pathway Programme Service for harmful sexual behaviours: <a href="mailto:pathwayservice@actionforchildren.org.uk">pathwayservice@actionforchildren.org.uk</a>	
<b>Cyberchoices</b>	For children at risk of being drawn into cybercrime via <a href="#">East Midlands Cyber Secure</a>	
<b>Homelessness or risk of homelessness</b>	Derby City council homelessness <a href="#">webpages</a>	(See relevant District Council website)

## Key National Contacts:

Organisation	Description and Contact Details
<b>NSPCC helpline for adults</b>	Helping adults protect children 24 hours a day. For help and support, including anyone needing advice about female genital mutilation, young people affected by gangs, concerns that someone may be a victim of modern slavery contact the NSPCC trained helpline counsellors on:  <b>Text: 88858</b> <b>Tel: 0808 800 5000</b> <b>Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></b>
<b>NSPCC helpline Report Abuse in Education</b>	Bespoke helpline for children and young people who have experienced abuse at school, and for worried adults and professionals who need support and guidance including for non-recent abuse:  <b>Tel: 0800 136 663</b> <b>Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></b>
<b>NSPCC Whistleblowing Advice</b>	Free advice and support for professionals concerned about how child protection issues are being handled in their organisation:  <b>Tel: 0800 028 0285</b> <b>Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></b>
<b>UK Safer Internet Centre professional advice line</b>	Helpline for professionals working with children and young people in the UK with any online safety issues they may face themselves or with children in their care:  <b>Tel: 0844 381 4772</b> <b>Email: <a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a></b>
<b>Police Anti-Terrorist Hot-Line number</b>	<b>Tel: 0800 789 321</b>
<b>National Domestic Abuse Helpline</b>	Hosted by <a href="#">Refuge</a> <b>Helpline: 08082 000 247</b>
<b><a href="#">Operation Encompass</a></b>	Resources for schools include free advice from an Education Psychologist about how best to support children via National Helpline  <b>Tel: 0204 513 9990</b>
<b>Report harmful online content</b>	UK Safer Internet Centre – <a href="#">report online harm</a> . A national reporting centre that has been designed to assist anyone in reporting harmful content online  <a href="#">CEOP</a> – to report online sexual abuse or the way someone has been communicating online

	<a href="#">Report online material promoting terrorism or extremism</a>
<b>Report Abuse in Education Hot-Line</b>	<p>Young people who have experienced abuse at school and parents and teachers who are concerned about sexual abuse in education settings can call the Report Abuse in Education helpline on:</p> <p><b>Tel: 0800 136 663</b></p> <p><b>Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></b></p>
<b>Harmful Sexual Behaviour Support Services</b>	<p>SWGFL Harmful Sexual Behaviour Support Service for the children's workforce:</p> <p><b>Tel: 03442 250 623</b></p> <p><b>Email: <a href="mailto:hsbsupport@swgfl.org.uk">hsbsupport@swgfl.org.uk</a></b></p> <p><a href="#">Stop it now!</a> For worries about a child's sexual behaviour. Includes <a href="#">Shore</a> which provides a safe and anonymous place for young people to get help and support. The aim is to prevent harmful sexual behaviours among young people.</p> <p><b>Tel: 0808 1000 900</b></p>

## 18. RISK ASSESMENTS / ACTION PLANS

Whenever there is an allegation of abuse, including concerns about sexual harassment and violence, made against a child, the DSL and other appropriate staff will draw together separate risk and needs assessments and action plans to support the victim and the alleged perpetrator. These will consider:

- The victim, especially their protection and support
- Whether there have been other victims
- The alleged perpetrator/s

- All the other children (and if appropriate adult students and staff) at the school, especially any action that are needed to protect them from the perpetrator/s, or from future harms
- The time and location of the incident and any action required to make the location safer
- When information can be disclosed to staff and others, including the alleged perpetrator and parents/carers

Whenever local authority children's social care and/or the police are involved, Freedom Foundation AP will work in collaboration to ensure the best possible support and protection is provided for both the victim and the alleged perpetrator.

All reports of child-on-child abuse (including sexual harassment and/or sexual violence) will be recorded through Freedom Foundation AP's internal reporting system, communicated and shared with the Home School who will record it in the child's safeguarding/child protection file. This will include all decision making, risk, and needs assessment and plans recorded in writing as outlined in Section 10 of this policy. [Click here to view our process](#)

Where appropriate incidents (low level needs) may be managed internally, Freedom Foundation AP will document and communicate these incidents with the Home School to ensure suitable action, via early help (emerging needs) or through local authority children's social care (complex/serious needs or child protection concerns); reports to the police will be run in parallel with children's social care as outlined in the [Derby and Derbyshire multi-agency safeguarding procedures](#) and in [Nottingham and Nottinghamshire Multi-Agency Safeguarding Hub](#), in particular Children who Present a Risk of Harm to Others and Online Safety and Internet Abuse procedures.

All risk and needs assessment and action plans whether internal or multi-agency will be reviewed and updated on a regular basis. Although the safeguarding responsibility lies with the Home School, if things do not improve or deteriorate the situation will be reconsidered. Freedom Foundation will use the Contextual Safeguarding School Beyond Referrals Self-Assessment Toolkit & Guidance to self-assess our response to harmful sexual behaviour. We will communicate concerns to the Home School in a timely manner. All relevant policies will be updated to reflect the lessons learnt and consideration given to the wider cultural issues within the school that enabled the behaviour to occur.

Where the victim or alleged perpetrator transfers to another education setting, **it will be the Home Schools duty** to ensure that the designated safeguarding lead **from the home school** ensures the new provider will be made aware of any on-going support needs (and will discuss this with the victim and where appropriate their parents, as to the most suitable way of doing this) as well as transferring the safeguarding/child protection file. In the case of

the alleged perpetrator, where appropriate, this will also include potential risks to other children and staff. **See Section 10 of this policy. 'Responding to concerns about a child's welfare'.**

**Any suspicion or allegations that a child has been sexually abused or is likely to sexually abuse another child (or adult) or where there are concerns about any other form of abuse, a referral must be made immediately to local authority children's social care and where appropriate, the police. This is the responsibility of the Home School and Freedom Foundation AP will support and provide all records to assist referrals.**

## **19. WORKING WITH PARENTS/CARERS**

We recognise the importance of working together with parents/carers to educate as well as safeguard and promote the welfare of children.

Freedom Foundation AP will ensure that:

- In partnership with the Home School, we work with parents positively, openly, and honestly
- Parents are encouraged to discuss their issues or concerns about safety and welfare of children, including any worries about a child's emotional well-being or mental health. They will be listened to and taken seriously
- Parents/carers are aware of our child centred approach to ensure that children are kept safe and well.
- Up to date and accurate information is kept about learners i.e.:
  - A. Names and contact persons with whom the child normally lives those with parental responsibility
  - B. We hold one emergency contact number
  - C. If different from above, those authorised to collect the child from the setting
  - D. Any relevant information provided by the Home School on referral which may impact on the safety and welfare of the child
- Information about our learners given to us by children themselves, their parents, or carers or by other agencies will remain confidential. Staff will be given relevant information on a 'need to know' basis in order to support the child
- It is made clear to parents and carers that the school has a duty to share information when there are any safeguarding concerns. Also, that there is a duty to keep records which relate to safeguarding work by Freedom Foundation AP the Home school, or partner agencies (as coordinated by the Home School). These will be kept securely, kept apart from the main pupil/student record and only accessible to key

members of staff.

- Where we have reason to be concerned about the welfare of a child, we will always seek to discuss this with the child's parents or carers first in agreement with the Home School. However, there may be occasions where we are not able to do this, for example, when by doing so, it places the child at additional risk or where it may not be possible to speak to the parents/carers.

## 20. STAFF ALLEGATIONS AND SAFEGUARDING CONCERNS

What staff should do if they have a safeguarding concern or an allegation about another member of staff or a concern about safeguarding practices within Freedom Foundation AP or the Home School:

At Freedom Foundation AP there are safeguarding processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. Our culture and environment support all of our staff to discuss matters that concern them in the workplace and, where appropriate, outside the workplace (including online) which may have implications for the welfare and safety of children. All concerns and or allegations about adults working in or on behalf of Freedom Foundation AP (including agency staff, and contractors) will be reported, recorded, and dealt with promptly and appropriately.

By doing so everyone in the AP will:

- Create and embed a culture of openness, trust, and transparency
- Help to identify concerning, problematic, or inappropriate behaviour at an early stage
- Minimise risk of abuse
- Ensure that Freedom Foundation AP staff are clear about professional boundaries and act within these, in accordance with Freedom Foundation's ethos and values

Freedom Foundation AP recognises there are two levels of allegation/concern:

1. Allegations that **may meet** the harms threshold
2. Allegations/concerns that **do not meet** the harms threshold, also known as 'low level concerns'

Our response to concerns/allegations is consistent with the [DDSCP Safeguarding Children Allegations against Staff, Carers and Volunteers procedure](#) .

### 20.1 ALLEGATIONS THAT MAY MEET THE HARMS THRESHOLD

This is where an allegation might indicate that a person will pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school. Where it is alleged that anyone working in the establishment, including agency staff, contractors, and volunteers has:

- Behaved in a way that has harmed a child, or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This includes any behaviour that may have happened outside school and is known as transferable risk.

Depending on the severity of the allegation, an AP staff member may be temporarily suspended until after an investigation has taken place. The decision on whether an AP staff member will be temporarily suspended or not will be decided by the Head of Provision and/or SLT on an individual basis, depending on the severity and context of the allegation.

Please see the Code of Conduct policy for more information on the formal investigation procedure.

#### **If you have concerns about another staff member:**

Staff who are concerned about the conduct of a colleague (including agency staff, contractors, and volunteers) must remember that the welfare of the child is paramount.

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff, then this should be reported without delay to Freedom Foundation AP's DSL who will communicate this with the home school's headteacher and the LADO.

Where there are concerns/allegations about the DSL this should be referred to the Head of provision:

Simon Green: [simon.green@freedomfoundationuk.org](mailto:simon.green@freedomfoundationuk.org)

or

Anna Malik: [anna.malik@freedomfoundationuk.org](mailto:anna.malik@freedomfoundationuk.org)

In a situation where there is a conflict of interest in reporting the matter to the Head of Provision this should be reported directly to the Local Authority Designated Officer (LADO). The member of staff should make a record which will include time, date, place of incident, persons present, what was witnessed, what was said etc; this should then be signed and dated. The form for recording any concerns is on the Shared Drive.

#### **Looking after the welfare of the child:**

Where a child has been harmed, or there is an immediate risk of harm to a child or if the situation is an emergency, local authority children's social care should be contacted and where appropriate the police. Freedom Foundation AP will always communicate this need with the home school DSL or Headteacher in the first instance for referral. It is the **Home School's designated safeguarding lead's responsibility** to ensure the child is not at

risk and refer cases of suspected abuse to children's social care. Freedom Foundation AP's DSL will ensure this is followed up and done within the expected timeframe.

For further information about how concerns which may meet the harms threshold will be investigated, recorded, and managed, see Freedom Foundations staff Code of Conduct Policy, which incorporates low-level concerns, managing allegations against staff and whistleblowing.

See 'Appendix 3: Managing Allegations Against a Member of Staff' for more information on how Freedom Foundation AP will manage safeguarding allegations.

## 20.2 ALLEGATIONS / CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

Allegations / concerns that do not meet the harms threshold are referred to as 'low-level concerns'. A low level concern does not mean it is insignificant, rather that the behaviour towards the child does not meet the harm threshold as outlined above.

A low- level concern is any concern, no matter how small, that an adult working in or on behalf of Freedom Foundation AP may have acted in a way that is:

- Inconsistent with the staff behaviour (code of conduct) policy, including inappropriate conduct outside of work, or
- Does not meet the harm threshold or is not serious enough to consider a referral to the Local Authority Designated Officer (LADO)

The behaviour can exist on a wide spectrum. Further information about distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour can be found in the staff behaviour (code of conduct) policy.

Staff should share low-level concerns in confidence with the designated safeguarding lead or Head of provision using the form on the Shared Drive.

Staff are also encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others and/or on reflection they believe they have behaved in a way that they consider falls below the expected professional standards.

Freedom Foundation AP's DSL will be the decision maker in respect of all low-level concerns; however, this may be undertaken in collaboration with the Head of provision.

Reports about agency staff or contractors will be notified to their employers.

All low-level concerns will be recorded in writing to include details of the concern, the context and the action taken. For further information about the procedure for recording and responding to low-level concerns see school staff behaviour (code of conduct) policy.



## Concerns about safeguarding practices within Freedom Foundation AP:

All staff are encouraged to raise concerns about poor or unsafe practice and potential failures in the provisions safeguarding regime. These concerns will be taken seriously by the senior leadership team.

For information about how to raise concerns with the senior leadership team or other channels see staff behaviour (code of conduct) policy, which incorporates the whistleblowing routes available to staff.

## 21 REPORTING

Freedom Foundation places a mandatory obligation on all Directors, paid staff, volunteers, contractors and partners to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse neglect or exploitation of vulnerable people, or which suggests this policy may have in any other way been breached. It is not the responsibility of the employees to decide whether or not abuse has taken place, however, concerns should be raised with an individual's line manager, functional lead or a designated safeguarding lead who will initiate the procedure for dealing with suspected or actual incidents of abuse (for details refer to the Safeguarding Pathway for reporting concerns).

### 21.1 SYSTEMS FOR CHILDREN TO REPORT CONCERNS / ABUSE

Even if there are no reports, all staff understand it does not mean it is not happening; it may be the case that it is not being reported. We recognise that children may not find it easy to tell staff about the abuse, that certain children may have additional barriers to telling someone and children can show signs or act in ways they hope adults will notice or react to. In some cases, victims may make indirect reports via a friend or staff may overhear conversations. All staff recognise the indicators and signs of child-on-child abuse and know how to identify it.

Freedom Foundation AP recognises the importance of ensuring that all children feel heard and understood. We have a culture of listening to children and taking account of their wishes and feelings in any measures the AP may put in place to protect them. Whenever there are any concerns, the child's wishes will be taken into account when determining what action to take and what services are provided.

The welfare and safety of a child is of paramount concern and staff will act in the best interests of the child.

We understand the difficulties that children may have in approaching staff about their circumstances and any concerns they may have. Some children may feel unable to report their concerns or abuse, others may have additional barriers to telling someone or may not recognise what is happening is abusive.

Freedom Foundation AP has an open and accepting attitude towards children and promotes a positive and supportive environment as part of our responsibility for care. Our ethos promotes trusted relationships between students and all staff which supports children to tell staff about any concerns they may have.

Children, parents/carers, and all staff will be free to talk about any concerns and see the AP as a safe place.

Many children can show signs or act in ways they hope adults will notice or react to; others may make indirect

reports via a friend or staff may overhear conversations. All staff are alert to this and to the potential need for early help and are aware of the indicators of abuse, exploitation and neglect and know what actions they should take.

## **21.2 ADDITIONAL SYSTEMS IN PLACE TO IDENTIFY CONCERNS / ABUSE**

Freedom Foundation AP has systems in place for children to complain and/or confidently report their concerns, including any form of abuse or neglect, including child-on-child abuse, and know that their concerns will be treated seriously.

Strategies in place include:

- Monitoring of song writing and creative journey writing
- Curriculum online safety and safer internet use topics and sessions
- Sessions and topics on healthy and non-healthy relationships
- Pupil voice gathering and assessing pupils understanding and views
- Lessons focussing on areas of safeguarding, wellbeing and mental health, online safety, and child on child abuse
- Anti-bullying messages

## **22 RECORD KEEPING**

Thorough record keeping is essential where any evidence or action taken in respect of safeguarding a child or adult occurs. Regardless of the outcome of the safeguarding concern workers must complete a safeguarding concern form.

The Designated Safeguarding Lead is responsible for monitoring disclosures and concerns and for informing the Safeguarding Team of any referrals, barriers or changes to practice to the safeguarding team.

### **22.1 ALLEGATIONS RECORD KEEPING**

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records unless the individual gives their consent for retention of the information. However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the following information is kept on the file of the person accused:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved

- A note of any action taken, decisions reached, and the outcome i.e. substantiated, unfounded or unsubstantiated
- A copy provided to the person concerned, where agreed by local authority children's social care or the police.
- A declaration on whether the information will be referred to in any future reference.

All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

## **22.2 RECORD KEEPING ON CONCERNS OR ALLEGATIONS THAT DO NOT MEET THE HARMFUL THRESHOLD**

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

If implemented correctly, this should:

- Enable schools to identify inappropriate, problematic or concerning behaviour early
- Minimise the risk of abuse
- Ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution

## **23 EQUAL OPPORTUNITIES**

Freedom Foundation is committed to anti-discriminatory practices. Any action taken within these guidelines will reflect equal opportunities principles.

## **24 CONFIDENTIALITY AND INFORMATION SHARING**

- Personal information about children is subject to a legal duty of confidence and should not normally be disclosed without their consent. However, the law permits the disclosure of confidential information if this is necessary to safeguard a child at risk.
- Personal information may be disclosed without the consent of the subject in order to prevent or detect a crime, to apprehend or prosecute an offender or where failure to disclose could prejudice such action.

c. Disclosure should be justifiable in each case and if there is any uncertainty legal advice should be sought. The principles to follow are listed below:

d. Obtained and processed fairly and lawfully.

e. That it is accurate.

f. Relevant and proportionate.

g. Not held longer than necessary.

h. That it is kept securely.

i. Only disclosed in appropriate circumstances on a need-to-know basis.

j. Only disclosed in appropriate circumstances on a need-to-know basis.

k. Guidelines laid out in the following legislation:

- [Data Protection Act 1998](#)
- [Police & Criminal Evidence Act 1984](#)
- [Crime and Disorder Act 1998](#)
- [Human Rights Act 1998](#)
- [Care Act 2014](#)
- [EU General Data Protection Regulation 2016/679 \(UK GDPR\)](#)
- [The Data Protection Act 2018](#)
- [DfE Data Protection Guidance for schools \(DfE 2024b\)](#)

l. Children will be made aware of the limits to confidentiality

## 25 POLICY REVIEW

Freedom Foundation will review this policy and associated procedure and guidance every 12 months.

Freedom Foundation will ensure workers have regular training and practice updates in the policy, procedure,

and guidance.

## 26 POLICY OVERVIEW

This policy should be read in conjunction with:

- Freedom Foundation Safeguarding Procedure
- Appendix 1: Handling Disclosures from a Child
- Appendix 2: Safeguarding Concern Form and Body Map
- Appendix 3: Managing Allegations against a member of staff/volunteers
- Freedom Foundation Code of Conduct
- Freedom Foundation Online Safeguarding Guidance for Parents/Guardians
- Freedom Foundation Online Safeguarding Guidance for Young People
- Confidentiality Policy
- Bullying and Harassment Policy
- Recruitment and Selection Policy
- Photography and Filming Policy

### REVIEW OF THIS PROCESS

We keep this policy under regular review:

- Review of this Policy: Jan 2025
- Next Review Date: Jan 2026
- Reviewed By: Laura Grant
- Position/Role: Director of Freedom Foundation

### FREEDOM FOUNDATION DIRECTORS – LAURA GRANT AND STACEY GREEN

#### DESIGNATED SAFEGUARDING LEADS:

Laura Grant: [laura.grant@freedomfoundationuk.org](mailto:laura.grant@freedomfoundationuk.org) / 07771 606 400



## APPENDIX 1: HANDLING DISCLOSURES FROM A CHILD

This appendix stands alongside our safeguarding policy and provides guidance for all Freedom Foundation employees. An 'employee' is defined as anyone who works for or on behalf of the Freedom Foundation, either in a paid or unpaid capacity. This therefore includes directly employed staff, directors, patrons, and volunteers to Freedom Foundation programmes.

It also covers implementing partners whom we fund, and who we expect to work under the policy as a condition of their involvement with Freedom Foundation.

### LISTENING TO A CHILD'S DISCLOSURE OF ABUSE NEGLECT OR EXPLOITATION

Firstly, never promise to keep a secret or confidentiality. You have a duty to ensure the information is passed on to the relevant agencies in order to keep the child safe. If a child requests confidentiality, use a 'prepared' response, such as 'I am really concerned about what you have told me, and I have a responsibility to help ensure that you are safe. To help make sure you are safe, I have to tell someone (name person) who will know how to help us to do this'. Make sure the child understands what will happen next with their information.

#### GENERAL POINTS:

- Accept what the child says
- Keep calm
- Do not panic
- Do not seek help while the child is talking to you
- Be honest
- Look at the child directly
- Do not appear shocked
- Let them know that you need to tell someone else
- Assure them that they are not to blame for the abuse

- Never ask leading questions
- Try not to repeat the same questions to the child
- Never push for information
- Do not fill in words, finish their sentences, or make assumptions
- Be aware that the child may have been threatened
- Take proper steps to ensure the physical safety and psychological well-being of the child; this may include referring them to medical treatment or to a psychologist
- Make certain you distinguish between what the child has actually said and the inferences you may have made. Accuracy is paramount in this stage of the procedure.
- Do not permit personal doubt to prevent you from reporting the allegation to the designated child protection officer
- Let the child know what you are going to do next and that you will let them know what happens

#### THINGS TO SAY:

- Repeat the last few words in a questioning manner
- 'I believe you'
- 'I am going to try to help you'
- 'I will help you'
- 'I am glad that you told me'
- 'You are not to blame'

#### THINGS NOT TO SAY:

- 'You should have told someone before'
- 'I can't believe it! I'm shocked!'
- 'Oh, that explains a lot'

- 'No not... they're a friend of mine'
- 'I won't tell anyone else'
- 'Why? How? When? Where? Who?'

#### AT THE END OF THE DISCLOSURE:

- Reassure the child that it was right to tell you
- Let them know what you are going to do next
- Immediately seek help, in the first place from the Designated Safeguarding Lead
- Write down accurately what the young person has told you. Sign and date your notes. Keep all notes in a secure place for an indefinite period. These are essential in helping your organisation / Social Services / the Police decide what is best for the child, and as evidence if necessary
- Seek help for yourself if you feel you need support

#### SAFEGUARDING DISCLOSURE PROCESS (CHILD)

When a child makes a disclosure, follow these steps:

1. While one facilitator is listening to the disclosure, the other continues with the session
2. Listen to the disclosure in a quiet/private space (but be sure you can be seen) without judgement and reiterate "Private and Safe but not Secret"
3. Complete a Safeguarding Concern Form while the child is speaking or as soon as possible after the disclosure

Please see the following guidance:

- When a disclosure is made this is the priority as it must be dealt with and reported within **24 hours**
- You can fill in a hard copy form from your facilitator delivery deck/HAF box or go to Teams and type in an editable PDF version of the form (don't forget to save regularly). You can find this form in the 'Safeguarding Appendix & Process Concern Forms' folder in the programme team you are delivering. This specific folder is shared with you ahead of delivery.'
- If you are an assistant, please find a private moment to inform your Lead of the disclosure as soon as possible



- Safeguarding Concern Forms must be completed by the person who listened to the disclosure
- The disclosure should be written in a clear and factual way, and the words of the child must be quoted when giving specific information about a situation. Do not add opinions.
- It is your role to listen and log the disclosure, not to investigate. Do not ask leading questions, do not dismiss the child or assume guilt and if in doubt it is always better to report a concern.
- It is not always appropriate to share a safeguarding concern with a parent/carer as it could put a child in more danger so you will need to consider if you should do this and if it is safe for the child to go home with them. If you are unsure speak to the Designated Safeguarding Lead.
- Complete one copy of the form as accurately as possible, do not make copies or edit different versions -you have one opportunity to get all the necessary information to make sure the content is not mis-remembered or altered in any way.
- Safeguarding Concern Forms may be used by other professionals who are looking at the case and in the worst-case scenario they can be used in court so they must be clear and accurate. Keep all the information on a Safeguarding concern form, rather than additional sheets of paper if possible.
- One Child making a disclosure= One Safeguarding Concern Form
- When you have listened to the disclosure and completed the form, please call the Freedom Foundation Designated Safeguarding Lead (DSL)
- Please put children's names on the Safeguarding Concern Form - make sure you have the full details to share with the Designated Safeguarding Lead when you call
- Freedom Foundation Leads, please stay with your Assistants to help them log the disclosure if they are the ones that received it
- Keep the information you have always logged confidential and only report to those who need to know. If you are affected by what you have heard, please speak to the Freedom Foundation Designated Lead to access support.
- Do not take Safeguarding Concern Forms home or share with anyone outside of the Freedom Foundation team
- Save digital forms on Teams and hard copy forms in your facilitator delivery deck (specific venue folder). Please return hard copy forms to the Freedom Foundation Designated Safeguarding Lead as soon as possible after the disclosure.
- If sending Safeguarding information via email, please put it on a document and share using [We Transfer](#) for additional security. Only use your Freedom Foundation email, not a personal one.

## APPENDIX 2 – SAFEGUARDING CONCERN FORM

Education settings must ensure that volunteers and staff are able to record concerns about:

- The welfare of a child or young person
- The behaviour of a volunteer, member of staff, governor or person connected with the AP

The following headings illustrate the minimum information that should be included in the local arrangements that is agreed within the individual education setting.

### Principles

A statement should be included on the form used in the setting that confirms:

*“Any member of staff, including volunteers, must record any concerns about a child or young person. This form must be completed as soon as possible after the discovery of the concern. If the concern is about:*

- *The welfare on a child: it must be sent to the designated safeguarding lead*
- *The behaviour of any member of staff: it must be sent immediately to the head of provision, or the advisory*

board if the allegation is against the head of provision. Or where the head of provision is the sole proprietor of an independent AP the allegations should be reported directly to the Local Authority Designated Officer (LADO).

*If the concerns are immediate, please inform an appropriate person straight away,”*

### Concerns about a Child or Young Person

Child's full name:		Date of birth:	
		Class/Year:	
Concern identified by:		Role:	
Date of concern:		Time of concern:	
Witness/es:		Place of incident:	
Name of alleged person (s) responsible for the harm / potential harm:			
Not known		Volunteer	
Learner in this AP		Member of staff	
Learner in another school/AP (please specify)		Other, please specify	
Family member			

### Concern / Incident / Disclosure: Why are you concerned about this child? What have you observed and when? What have you been told and when?

Please provide a description of any incident/s or anything you see or have been told by a child, or another person. Record any visible injuries or ask the child/young person to point to where else it is sore/hurts. Do not remove or lift clothing for the purpose of the examination unless the injury site is freely available because of treatment or take photos of injuries. If photos of injuries are required for evidence purposes, then this should be done by the police. Remember to make clear what is fact and what is hearsay/opinion. Note the language and terminology used by the child, or adult, and be clear about who has said what. Continue on a separate sheet if necessary.

### Has any action already been taken in relation to this concern?

For example, child taken out of class, first aid

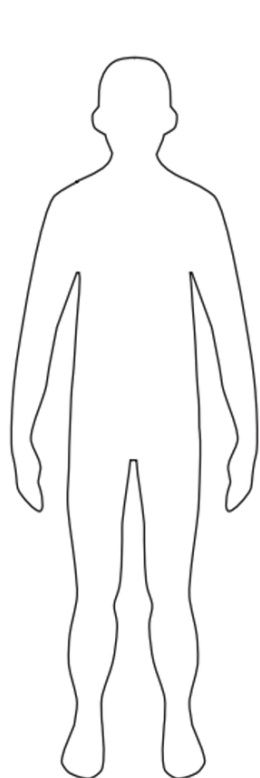
Name of person concerns reported to	Date

Action to be taken / recommendations from designated safeguarding lead

Name of person completing form	Signature	Date and time

Body Map:

## FREEDOM FOUNDATION BODY MAP



NAME OF CHILD

DATE OF BIRTH

NAME OF WORKER

DATE RECORDED

OBSERVATIONS

## APPENDIX 3 – MANAGING ALLEGATIONS AGAINST A MEMBER OF STAFF/VOLUNTEER

Freedom Foundation is committed to having effective recruitment and human resources procedures, including checking all staff and volunteers to make sure they are safe to work with children and young people. Where appropriate, key staff involved in recruitment processes will undertake Safer Recruitment Training.

However, there may still be occasions when there is an allegation against a member of staff or volunteer. Allegations against those who work with children, whether in a paid or unpaid capacity, cover a wide range of circumstances.

All allegations of abuse of children by those who work with children or care for them must be taken seriously and all reports of allegations must be submitted within one working day to the Designated Safeguarding Lead.

**The following procedure should be applied in all situations where it is alleged that a person who works with children has:**

- Behaved in a way which has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or related to a child

- Behave towards a child or children in a way which indicates that he/she is unsuitable to work with children

The allegations may relate to the person's behaviour at work, at home or in another setting. The Designated Safeguarding Lead will discuss the matter to determine what steps should be taken and where necessary, obtain further details of the allegation and the circumstances in which it was made. Depending on the severity of the allegation, an AP staff member may be temporarily suspended until after an investigation has taken place. The decision on whether an AP staff member will be temporarily suspended or not will be decided by the Head of Provision and/or SLT on an individual basis, depending on the severity and context of the allegation.

Please see the Code of Conduct policy for more information on the formal investigation procedure.

The discussion will consider whether there is evidence/information that establishes that the allegation is false or unfounded, whether a referral to Nottingham/Derby City or County Safeguarding Boards, LADO, and the Police is required and/or whether disciplinary action is appropriate.

Some allegations will be so serious, and as such, an immediate referral to the Nottingham/Derby City or County Safeguarding Boards and the Police will be made.

If the allegation is not obviously false and there is cause to suspect that a child is suffering or is likely to suffer significant harm, the Home School Designated Safeguarding Lead (supported by Freedom Foundations AP DSL) will immediately refer the matter to the Nottingham/ Derby City or County Safeguarding Boards and ask for a Strategy Discussion / Meeting to be convened straight away.

Some allegations may be less serious and at first sight might not seem to warrant consideration of a police investigation or enquiries by Nottingham/ Derby City or County Safeguarding Boards. However, all allegations are followed up and examined objectively by someone independent of the organisation.

Where such allegations are made, consideration must be given to the following three strands:

- The police investigation of a possible criminal offence
- Enquiries and assessments by Children's Social Care Services as to whether the child is in need of protection or in need of services
- Consideration by an employer of disciplinary action in respect of the individual.

## **ACTION FOLLOWING THE CONCLUSION OF THE EXTERNAL INVESTIGATIVE PROCESS**

At the conclusion of any external investigations, the Designated Safeguarding Lead will formally review the outcome and determine any further action required. Following completion of the internal investigation the Investigating Staff Member will complete a report detailing the relevant information, their actions, and any recommendations.

### **Options include:**

- Reintegration of staff member or volunteer

- Performance management or capability processes invoked
- Disciplinary process invoked, following the Disciplinary; Police Referral to the Disclosure and Barring Service (DBS) (equivalents in the other nations) for consideration to be barred from working with children.

The investigating staff member will determine who needs feedback following the conclusion of any investigations and the nature of that feedback in accordance with the principles of data protection and confidentiality.

This might include feedback to the child, adult at risk, his/her parents/carers, and/or the person who raised the concern initially, and the line manager of the staff member or volunteer.

The Investigating Staff Member must provide in writing feedback to the person who has been subject to the investigation, clarifying the outcome and any implications for their employment/volunteering.

This should normally be provided within five working days of the conclusion of the investigation.