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## Child Protection and Safeguarding Policy

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## Important Contacts

CONTACT	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Darryl Holdcroft	Darryl@arcadiacare.co.uk
Deputy DSL	Angharad Crane	Angharad@arcadiacare.co.uk
School Proprietor	Jawad Sheikh	jawad@arcadiacare.co.uk
Wolverhampton Safeguarding Children Partnership Team	Wolverhampton-Children Safeguarding Concerns	Tel.: 01902 555392 (Monday – Thursday 8:30am – 5:00pm and 8:30am – 4:30pm on Fridays)  Out of hours number: 01902 552999
Wolverhampton Children Services - Social Care	Wolverhampton Social Services-	Public phone numbers : 01902 551199 / 01902 551155.
Safeguarding Officers/ Local Authority Designated Officer (LADO) and Deputies.	-Kenny Edgar	<a href="mailto:kenny.edgar@wolverhampton.gov.uk">kenny.edgar@wolverhampton.gov.uk</a>
Park Lodge Hospital Safeguarding	Park Lodge Safeguarding Leads- Sharon Donaldson- Maria Walters and	<a href="mailto:sharon@arcadiacare.co.uk">sharon@arcadiacare.co.uk</a> <a href="mailto:maria@arcadiacare.co.uk">maria@arcadiacare.co.uk</a> <a href="mailto:steve.allen@arcadiacare.co.uk">steve.allen@arcadiacare.co.uk</a>

Leads.	Steve Allen	
NSPCC	Whistle-blowing helpline	0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Forced Marriage Unit		020 7008 0151 or <a href="mailto:fmufco.gov.uk">fmufco.gov.uk</a>

### Aims:

Park Lodge School is an independent institution situated within a CAMHS Tier 4 facility catering to young individuals aged 11-18 who are grappling with eating disorders. Our student body comprises 12 learners, and our unwavering commitment revolves around fostering a secure, compassionate, and intellectually stimulating learning environment. Here, we encourage our students to stay aligned with their academic pursuits from their home schools.

Our topmost priority at Park Lodge School is to ensure the physical, mental, and emotional well-being of every student, both within and beyond the school premises. We have instituted a comprehensive whole-school approach to proactively address safeguarding concerns, always placing the welfare of our pupils at the forefront of our actions. Our collaboration with the Park Lodge staff ensures that efficient safeguarding measures and protocols are consistently implemented for the benefit of all patients.

This policy serves as a definitive and coherent framework for upholding our commitment, in accordance with safeguarding legislation and statutory guidelines. We will achieve this commitment by:

- Ensuring that members of the advisory board, the head teacher, and staff comprehend their responsibilities under safeguarding laws and statutory directives, remain vigilant about indicators of child abuse, and know to report concerns to the DSL (Designated Safeguarding Lead).

- Educating our pupils on personal safety and helping them identify unacceptable behaviours.
- Recognising and offering support to any pupil who has been subjected to, or is at risk of, abuse, neglect, or exploitation.
- Cultivating a culture of secure recruitment by adopting procedures that actively discourage, reject, or identify individuals who may pose a threat to children.
- Ensuring that the head teacher and any new staff and volunteers are appointed only after the completion of all necessary background checks.

The DSL for our school is Headteacher Darryl Holdcroft. In the DSL's absence, child protection matters will be overseen by SENCO Angharad Crane. In cases where neither the school DSL nor deputy DSL are available, the advisory board designates a Safeguarding Lead who also holds the position of Hospital Director, filled by Sharon Donaldson.

### **Legislation and Statutory guidance.**

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

### **This policy is also based on the following legislation:**

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children.
- [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it’s proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they’re being disproportionately subjected to sexual violence or harassment.
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- Equality Act 2010
- Counterterrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

## **Definitions**

## **Safeguarding and promoting the welfare of children means:**

- Protecting children from maltreatment.
- Preventing 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.

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**‘Children’** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will plan to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA

- The chief officer of police for a police area in the LA area

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

For the purposes of this policy, **“consent”** is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **“sexual violence”** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe



that B consents.

- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **“sexual harassment”** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

**Sexual harassment can include, but is not limited to:**

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Sharing unwanted explicit content.
- Upskirting.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion, and threats.

For the purpose of this policy, the term **“sexual violence”** encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

For the purpose of this policy, **“child on child”** abuse is defined as abuse between children.

**This can include, but is not limited to the following:**

- Abuse within intimate partner relationships (sometimes known as ‘teenage relationship abuse’)
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Sexual violence and sexual harassment (this may include an online element)
- Physical abuse and physical harm
- Sexting
- Initiation/hazing-type violence and rituals

For the purposes of this policy, **“upskirting”** refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as **“sexting”**, is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing.
- A child touching themselves in a sexual way.
- Any sexual activity involving a child.
- Someone hurting a child sexually.

- Sexual activity that involves animals.

### **Equality Statement**

Certain children may face an elevated risk of experiencing abuse, and for some, there may be added challenges when it comes to identifying or reporting such incidents. Our steadfast commitment lies in practicing anti-discrimination and acknowledging the diverse circumstances that children may encounter. We guarantee that all children receive equal protection, irrespective of any hurdles they might encounter.

During their enrollment at Park Lodge School, our students are undergoing hospitalisation due to one or more mental health conditions, rendering them more susceptible in terms of safeguarding. We take this heightened vulnerability into account in every facet of our operations.

### **We give special consideration to children who:**

- Have special educational needs (SEN) or disabilities.
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after.
- Are missing from education.

Whose parent/carer has expressed an intention to remove them from school to be home educated

## **Roles and Responsibilities**

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors (Advisory board) in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

### **This will be underpinned by our:**

- Behaviour policy.
- Planned programme of relationships, sex and education (RSE) & Personal, social and health education (PSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships.
  - Boundaries and consent.
  - Stereotyping, prejudice and equality.
  - How to recognise an abusive relationship (including coercive and controlling behaviour).
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
- What constitutes sexual harassment and sexual violence and why they're always unacceptable.

## **Roles and Responsibilities of ALL STAFF**

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

**All staff will:**

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Provide a safe space for pupils who are LGBT to speak out and share their concerns.

**All teaching staff have a responsibility to:**

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- To adhere to Safeguarding and Child protection policy and reporting procedures outlined within.

**All staff will be aware of:**

- Our systems which support safeguarding, including this child protection and safeguarding policy, the DSL ( Headteacher Darryl Holdcroft and SENCO Angharad ), the behaviour policy, and the safeguarding response to children who go missing from education.
- The role of the DSL and deputy DSL ▶The fact that 'it could happen here'.
- The importance of considering at all times what is in the best interest of the pupil.
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.

- The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child- on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children can be at risk of abuse or exploitation in situations outside their families (extra- familial harms).
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.
- What to look for to identify children who need help or protection.
- The fact that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another.
- The indicators of child-on-child abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting.
- The necessary procedures to follow to prevent child-on-child abuse.
- The behaviours linked to drug taking, alcohol abuse, truancy and sexting, and will understand that these put pupils in danger.
- The effects of a pupil witnessing an incident of abuse, such as witnessing domestic violence at home.
- When identifying pupils at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:
- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age.

- Lack of concentration and acting withdrawn.
- Knowledge ahead of their age, e.g. sexual knowledge. Use of explicit language.
- Fear of abandonment.
- Depression and low self-esteem.

### **Roles and Responsibilities of The Designated Safeguarding Lead (DSL)**

The DSL is a member of the senior leadership team. Our DSL is the head teacher, Darryl Holdcroft . The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Outside of school hours, the DSL can be contacted via email ([darryl@Arcadiacare.co.uk](mailto:darryl@Arcadiacare.co.uk)) or by personal mobile phone in urgent matters; the hospital has this phone number on record.

When the DSL is absent, the DSO, (listed above in the contacts) will be reachable.

If the DSL and deputy are not available, the Hospital Director Sharon Donaldson, or social work Practitioner Steve Allen will act as cover (for example, during out-of-hours/out-of-term activities).

### **The DSL will be given the time, funding, training, resources and support to:**

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Act as a source of support, advice and expertise for all staff. Act as a point of contact with the safeguarding partners.

- Liaise regularly with other hospital DSLs and mental health professionals, particularly where safeguarding concerns are linked with mental health.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR

**The DSL will also:**

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters; specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Ensure the best educational outcomes by identifying at-risk pupils to the school and its staff, so that the relevant personnel understand each pupil's educational and welfare needs.
- Support teaching staff to identify the challenges that at-risk pupils may face and the additional academic support and adjustments they can make to support these pupils.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- The full responsibilities of the DSL and deputy are set out in their job description.

**Roles and Responsibilities of The Head Teacher**

The head teacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.



- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

### **Contextual Safeguarding**

The school will work with Local Authorities, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for social services from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

### **Information Sharing**

Park Lodge School recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If

staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL(s).

### **Confidentiality**

The school will exclusively involve staff and agencies necessary for assisting the child and/or conducting any inquiries. If a child requests that a staff member keep a disclosure or incident confidential, the staff member cannot make such a commitment. Even in the absence of the child's consent, the information may be lawfully disclosed if it is in the public's interest and/or serves to safeguard the child or others from harm.

#### **All staff are aware that:**

- Timely information sharing is essential to effective safeguarding.
- 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.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purpose of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

**The DSL should consider that:**

- Parents or carers should normally be informed (unless this would put the victim at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

**Regarding anonymity, all staff will:**

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumors and exposing victims' identities.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

## **Recognising Abuse and Taking Action**

Staff, volunteers, and management committee members must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL or DSO”.

### **If a child is suffering or likely to suffer harm, or in immediate danger:**

Make a referral to children’s social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral.

### **Staff are aware of the following procedure:**

Where a child is suffering from harm, likely to suffer from harm, or is in immediate danger:

- Tell a DSL or deputy as soon as possible; and
- Contact children’s social care (and the police, if appropriate) immediately

If you want to refer a child or young person to Children's social care in an emergency contact Wolverhampton Social Services:

**01902 555392 (Monday - Thursday 8:30am – 5:00pm and 8:30am - 4:30pm on Fridays) OUT OF HOURS: 01902 552999**

At Park Lodge School, students are admitted from local authorities throughout the UK. If a referral needs to be made to their home local authority, contact details can be found here:

<https://www.gov.uk/report-child-abuse-to-local-council>

If the child is in immediate danger, no matter the child’s local authority, the local police should be contacted.

If you’re worried about online abuse or the way someone has been communicating online, a report to CEOP should also be made [here](#).

**If a child makes a disclosure to you or if a child discloses a safeguarding issue to you, you should:**

- Listen to and validate them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you.
- Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on.
- Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so.
- Log the disclosure on the hospital's report writing system to ensure hospital DSLs and other relevant parties are fully informed. Mark the disclosure as confidential to ensure only the parties are informed.

**Bear in mind that some children may:**

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected Not recognise their experiences as harmful.
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.
- None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

**If you discover that FGM has taken place, or a pupil is at risk of FGM:**

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

**Any teacher who either:**

- Is informed by a girl under 18 that an act of FGM has been carried out on her; **or**
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth.

**This must immediately be reported this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.**

- Unless they have good reason not to, they should also discuss the case with the DSL and involve children’s social care as appropriate.
- Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.
- The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
- Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures (See appendix 6).

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

## **Notifying parents**

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information

we provide about the other child involved, and when. We will work with the police and/or local authority

children's social care to make sure our approach to information sharing is consistent.

## **Pupils with special educational needs and disabilities**

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

Difficulty in understanding what is happening to them or understanding that it constitutes abuse  
Communication barriers and difficulties in managing or reporting these challenges  
Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy).

## **Mental Health**

All students at Park Lodge School are enrolled due to their admission at the Bere Clinic due to a diagnosis of eating disorder and they often have other mental health problems in addition. Our teaching staff are aware of and sympathetic to the effects of mental health issues within school. We are also aware that mental health problems and hospital admission can make our students more vulnerable to abuse and/or being targeted by perpetrators of CSE, CCE, radicalisation as well as many other forms of abuse.

All staff will be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only trained professionals will make a diagnosis of a mental health problem, but staff are well placed to observe young people and identify those whose behaviour suggests they may be experiencing a mental health problem, or be at risk of developing one.

Staff are aware of how abuse, neglect and other traumatic adverse childhood experiences can affect a young person's mental health, behaviour and education.

Staff will take action on any mental health concerns that are also safeguarding concerns, by speaking to the DSL or deputy DSL.

Staff will not assume that any concerns regarding a student's mental health will already have been addressed by the medical or nursing team and will report any concerns or changes to the head teacher and hospital MDT.



We offer extra pastoral support for all pupils owing to their SEN or disabilities and mental health problems. This includes regular one-to-one meetings with their link teacher (at least every two weeks and as and when issues arise), weekly MDT care planning meetings and four to six-weekly individual reviews prior to MDT

Care Programme Approach meetings. The students themselves attend at all MDT meetings either in person or on the phone if they are on extended home leave. We also liaise closely with a pastoral lead and or safeguarding lead at their home school to share relevant information and build a picture of the student's overall wellbeing. We discuss any concerns as and when they arrive, as well as providing the student with weekly progress reports, including their mental health functioning scores.

### **Students already requiring support**

Park Lodge School recognises that some groups of pupils can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils.

Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

- Pupils who need social workers
- Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

## **Home-educated children**

If a child is referred to BCS who is currently Electively Home Educated, we will contact the appropriate Local Authority to make them aware. This will be done with the consent and knowledge of parents, unless this is not in the best interests of the child Looked-after and previously looked after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSL has details of children's social workers and relevant virtual school heads

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

## **Mobile phones and cameras**

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to noncontact time when pupils are not present. Staff members' personal phones will remain in their bags in their lockers during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras. We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

No images or videos may be taken of the students without their explicit prior written consent in a standard

consent form issued by Park Lodge. For under 18s, this consent form must also be signed by their parent or guardian.

Students are not permitted to bring mobile phones into the school room. All students must sign a Student Agreement on admission, documenting their agreement not to bring their phone into the school room and informing them phones will be confiscated if this agreement is not followed. Students also sign to acknowledge their understanding the reasons for this including safeguarding and patient confidentiality.

### **Complaints and concerns about school safeguarding policies**

#### **Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our complaints procedure (See complaints procedure)

#### **Other complaints**

All complaints arising from the operation of this policy will be considered under the school's complaint procedure (available upon request from the head teacher or on our school's website)

### **Whistle-blowing**

If staff, parents or pupils have concerns about the school's safeguarding procedures and feel they cannot address this with the DSL or deputy, they can contact a member hospital safeguarding team (an updated list is displayed on the notice board through the reception or via the Important Contacts (contents page of this policy)).

Use the NSPCC whistle-blowing helpline if you feel you can't raise your concern internally, or if your concern isn't addressed: 0800 028 0285 | [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Any complaints against staff members will be dealt with anonymously in the interest of continued positive working relationships wherever possible.

## **Record-keeping**

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- Concerns and referrals will be kept in a separate child protection file for each child.
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school in line with hospital record-keeping.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. This is also the case when students return to their home schools, however the DSL at the home school will have been informed of any relevant incidents, disclosures or investigations throughout admission; students are dual registered at Park Lodge School and their home school, thus their home school are crucial to multi-agency working.

## **Training**

All staff:

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will be in line with advice from the 3 safeguarding partners. Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

Safeguarding updates and refresher training is undertaken by all teaching staff at the first INSET day of each school year.

Have regard to the Teachers' Standards to support the expectation that all teachers:

Manage behaviour effectively to ensure a good and safe environment

Have a clear understanding of the needs of all pupils

Relevant safeguarding updates are shared with all teaching staff (via email or meetings), actioned (where necessary) and acknowledged with a signature in the school's Lessons Learnt folder (In Reception) as soon as they are brought to the DSL's attention.

The head teacher / DSL discusses safeguarding as a standard agenda item with every staff member in their half-termly supervision session. These also include questions and scenarios to audit the staff member's understanding of safeguarding throughout the year.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

*The DSL and deputy*

The DSL and deputy will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

### 16.3 Governors (“advisory committee members”)

All members of the advisory board are trained about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of the management committee may be required to act as the ‘case manager’ in the event that an allegation of abuse is made against the head teacher, they receive training in managing allegations for this purpose.

#### Recruitment – interview panels

Darryl Holdcroft, DSL and head teacher has undertaken Safer Recruitment training and will be a member of the interviewing panel for any recruitment within school. In the exceptional circumstance that she does not form part of the panel, at least one person conducting any interview for a post at the school will have undertaken safer recruitment. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

#### Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues. This supervision takes place at least once per half term and contains, as a matter of course, safeguarding and the effects of working with students with mental health problems as standing agenda points.

#### Curriculum and ethos

Respect for others can be taught and encouraged throughout the curriculum; it is fundamental to the aims and ethos of the school and underlies all policies and good practice. The curriculum promotes positive attitudes and builds skills and self-esteem so that children and young people can and will make healthier life choices.

We promote appropriate relationships free from abuse, exploitation, violence and harassment of any kind.

The PSHE (personal, social and health education), and the citizenship curricula deal directly with the promotion of a healthy respect for oneself and others. They will also help to foster an understanding of cultural and ethnic diversity within our society including issues around extremism and extremist behaviour.

This also enables the young people to question moral and health issues around various beliefs and engender understanding and informed decision making around their own sexual health. We also, through the delivery of PSHE, increase awareness among pupils and staff of the issues around FGM (female genital mutilation) CCE (child criminal exploitation), CSE (child sexual exploitation), online & offline safety and other safeguarding issues.

When timely issues are identified locally, nationally, or globally, these are addressed as soon as possible in standalone PSHE sessions which we are able to facilitate quickly due to our flexible timetable.

Bullying will also be addressed through the curriculum and issues arising from social media bullying and its consequences. Bullying will not be tolerated in any form within the school setting and on educational visits etc. Any young person involved in bullying will be dealt with in a measured and appropriate way, in order that the behaviour doesn't reoccur. This should be done with the head teacher present in accordance with the school Preventing-Bullying Policy. Correct use of IT and technology (phones etc.) are covered in our Acceptable Use section of the student agreement. We aim to protect our pupils from bullying and exploitation through the use of computers and phones via the internet. We do not tolerate any form of cyberbullying and have safeguards in place to help prevent this whilst pupils are in our care. When

admitted to the school all students sign a student agreement which details the school's stance on bullying and acceptable use. Each student signs this to acknowledge their understanding of these points and are provided with a copy for their reference.

Any sexual activity or inappropriate relationships between pupils must be reported to the DSL and will be considered within a child protection context.

### **Work experience**

It is unlikely that students within this setting will be sent out on work experience due to the nature of the setting.

Should a student be sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place and students will be accompanied by a member of the teaching staff or nursing team at least on their first visit and usually for all subsequent visits. The hospital school does not accept external students to complete work experience due to the confidential and sensitive nature of the setting.

### **Monitoring arrangements**

This policy will be reviewed annually and at any other point during the year when changes or additions need to be made by Darryl Holdcroft. At every review, it will be approved by the head of education Darryl Holdcroft, and the Proprietor Iman Sheikh