



Ealing Alternative Provision (EAP)

SAFEGUARDING AND CHILD PROTECTION POLICY 2023-2024

STATEMENT OF INTENT

Ealing Alternative Provision (EAP) Safeguarding and Child Protection policy applies to all staff and volunteers working within EAP and ensures we provide an overall environment that is safe for children and conducive to their learning, development and wellbeing by:

- Following safe recruitment procedures
- Providing ongoing training of staff in the area of Child Protection
- Outlining clear procedures for managing a Child Protection issue
- Supporting vulnerable and at risk children in conjunction with other agencies
- Seeking to put in place protective factors for any child at risk
- Protection from radicalization and extremist narratives

Safeguarding and child protection is at the forefront of what EAP does to support pupils and underpins all aspects of process and policy development.

CONTEXT

- It is the responsibility of any professional working with children to work to safeguard them and promote their welfare (*Keeping Children Safe in Education September 2023 DfE*). *Working together to Safeguard Children (2018)*
- Section 11 of the Children Act 2004 creates a duty for key agencies who work with children to put in place arrangements to make sure that they take account of the need to safeguard and promote the welfare of children when doing their jobs.
- Section 175 of the Education Act 2002 requires Local Education Authorities to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. It must have regard to any guidance issued by the Secretary of State in considering what arrangements it needs to make for this purpose.
- The Children Act 1989 states that the Local Authority has a general duty to safeguard and promote the welfare of children within their area who are in need (Section 17) and a duty to investigate when there is a reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm (Section 47)
- The School Staffing (England) Regulations 2009 (Single Central Record / Safer Recruitment Techniques)
- Statutory Guidance on FGM which sets out responsibilities with regards to Safeguarding and supporting girls affected by FGM

- Working together to Safeguard Children 2023 –A guide to multi-agency working to help,protect and promote the welfare of children – HM Government
- The Rehabilitation of Offenders Act (1974) which outlines when people with criminal records can work with children.
- Statutory Guidance on Prevent duty – which explains school's duties under the Counter Terrorism and Security Act (2015) with respect to protecting people from the risk of radicalization and extremism.
- The Human Rights Act (1998) which explains that being subject 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 protected characteristics including disability; sex; sexual orientation; gender reassignment and race.

PRACTICE

Safe Recruitment Procedures

EAP follows Ealing Council guidelines on Safe Recruitment and will always undergo the following checks before employment of a member of staff, members of the Management Committee, regular staff visitors or volunteers commences:

- Obtain references
- Enhanced DBS check (Disclosure and Barring Service)
- A check of DFE List 99 and/or the Protection of Children Act List
- Verification of candidate's medical fitness
- Verification of any relevant professional status and whether any restrictions have been imposed by the NCTL (National College for Teaching and Leadership)
- Proof of Right to Work in the UK
- Prohibition Order check

This is the immediate responsibility of the HR Administrator and ultimately the Head Teacher of EAP and the Management Committee. A Single Central Record is kept by the HR Administrator. All staff are added to the SCR no matter how long they work at EAP. Details will be removed when they leave.

EAP staff are aware that Data protection activity must comply with GDPR.

Training of staff in the area of Child Protection

EAP has a nominated member of the Management Committee for Safeguarding. Currently the member is Veronica Griffin.

The nominated Management Committee member and Designated Safeguarding Lead (DSL) will ensure their training is kept up to date by attending regular refresher courses (at least every two years).

Relevant learning and changes to London Child Protection Procedures will be passed on to all staff through regular meetings and Staff training. In line with DFE guidance, whole school training will take place at least every 3 years. However, given the nature of the work of a PRU it is recommended that continual training should be a priority for the institution.

- **Safeguarding update completed by all staff 01/09/23. This included the changes to KCSiE September 2023**
- **Child Protection Refresher training was completed by all staff September 2023**
- **Prevent training online for the whole school to take place on 08/11/23**
- **Training on monitoring and filtering using SENSO to be arranged**
- **DSL's responsible for online safety which includes the expectations applicable roles and responsibilities in relation to filtering and monitoring**

The Designated Safeguarding Leads for EAP are Dee Higgins, Deputy Head and Karin Weisskopf, Pastoral Lead.

The Staff Code of Conduct must be signed by staff as part of their Induction. This includes an e-safety form.

Staff have read and signed Part 1 of KCSiE and completed an EDUCARE. Certificates issued.

Procedures for managing a Safeguarding issue

Staff members are trained to be aware of:

- Risk factors of potential harm and also vulnerability to multiple harms
- Indicators of actual harm
- Preventing impairment of children's' mental health
- Disclosures
- Possible radicalisation
- How to tackle sexism and sexual harassment in school

Staff members are also trained to be aware that:

It is the responsibility of all staff to act on any concerns they might have, it is not any one person's sole responsibility.

- Although all staff may raise concerns directly with Children's Social Care Services this should be with the support of the Designated Safeguarding Lead.
- Safeguarding concerns about adults in the school should be made directly to the Headteacher.
- Any concerns about pupils should go to the Designated Safeguarding Lead
- All staff should be aware that safeguarding incidents could happen anywhere and staff should be alert to possible concerns being raised in this school.
- EAP should contextualise safeguarding, taking into account the child's complete social sphere, not just that in school.
- Staff should realise the difficulties children have to telling someone they've been abused and how to respond to concerns and disclosures. Staff need to determine how best to build trusted relationships.
- Extra and Intra familial harms are referenced in the new guidance.

- Sexual violence and sexual harassment between children is now incorporated into the guidance.
- Peer on peer abuse is now changed to child on child abuse.
- Online safety messaging has been strengthened to promote a whole school approach.
- For safer recruitment EAP will consider carrying out an online search as part of our due diligence on shortlisted candidates.
- The importance of RSHE
- The importance of the DSL's understanding of and implementing of an appropriate adult when required (PACE Code C 2019)

In the incidence of any of the above, the staff member is to consult the Designated Safeguarding Lead immediately. Several factors will be taken into account when considering the risk for the particular child such as age, history, and previous knowledge of family, pervasiveness and the existence of any protective factors. Where appropriate, detailed records may need to be kept including observations and evidence gathered over time.

Where possible a child protection concern should be discussed with the parent, informing them that a referral is being made and agreement sought for referral to Social Services, unless seeking agreement is likely to place the child at risk of significant harm through delay or the parent's actions or reactions.

EAP hold more than one emergency contact number for pupils wherever possible.

Once an issue has been reviewed and a referral to Social Services deemed necessary, the Designated Child Protection Officer will follow the guidelines issued by the Designated Safeguarding Lead for Ealing Council Education Department.

When a pupil leaves EAP, the CP file is sent separately to the new school and EAP must pass on any concerns in advance of the child leaving EAP. The file will be sent within 5 days for an in-year transfer.

Online safety is part of the whole school safeguarding approach. EAP will monitor parental engagement with online safety. EAP has an appropriate level of security to protect users and their data. This will be reviewed annually, including a risk assessment that considers the risks the pupils face.

Child Sexual Exploitation.

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example, food, accommodation, drugs, alcohol, gifts, money or in some cases, simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly consensual relationship where sex is exchanged for affection or gifts, to serious organized crime by gangs and groups. However it is important to recognize that some young people who are being sexually exploited may not exhibit any external signs of this abuse.

Sexual harassment and sexism.

Children are at risk of online (as well as face to face) abuse. This can include abusive, harassing and misogynistic messages, non consensual sharing of indecent nude and semi nude images/videos, especially around chat groups, sharing of abusive images and pornography, to those who do not wish to receive such content.

Child Criminal Exploitation.

This includes pupils being coerced into criminal activity, such as county lines. Staff should seek advice on when to contact the Police and be aware of the National referral Mechanism. Staff are aware of Operation Encompass which is a National Domestic Abuse help line.

Female Genital Mutilation. (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There are a number of key indicators staff should be aware of, for example, the cultural background of a girl, her age, a long absence from school.

Preventing Radicalisation.

If EAP receives specific information from the excluding school about a pupil due for admission a risk assessment would be carried out at the weekly Placement Panel.

Staff must be aware of and report any concerns about possible radicalisation of pupils. The DSL will report these concerns to the designated Prevent officer within the LA. Interventions would include referral to CHANNEL, working with the Safer Schools Officer, referral to Counselling services.

The Prevent strategy lead for EAP is Marcus McTurk

EAP is engaged with the local LA Prevent team.

Staff are aware of the threat of terrorism; an action that endangers or causes serious violence to a person, damage to property or serious disruption to an electronic system.

Looked After Children.

The most common reason for children becoming Looked After (LAC) is as a result of abuse and/or neglect. As part of keeping Looked after Children safe, staff should be aware of the details of the care arrangements, including who has parental responsibility. The LAC DT (DH) should include the educational achievement of previously LAC, adopted children or those with SGO's or Child Arrangement orders. The DSL should liaise with a LA personal advisor over Care leavers.

Bullying, including Cyber bullying,

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Staff must record details of peer on peer abuse and seek to minimise the risk.

Domestic Violence.

Domestic violence and abuse is defined as incidents or patterns of incidents of controlling, coercive, threatening behaviour, violence or abuse.

Drugs.

Drugs include alcohol, tobacco, illegal drugs, medicines, psychoactive substances, (legal highs) and volatile substances.

Fabricated or Induced illness.

FII is a form of abuse involving a parent or carer inventing, exaggerating or deliberately causing symptoms of illness in a child.

Faith Abuse.

This is a form of child abuse that is linked to someone's faith or belief.

Forced Marriage.

A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it.

Gangs and Youth Violence.

A gang is typically a noticeable group of individuals that spends time in public and engages in criminal activity and violence. Knife crime is now a key feature of these activities. Child on child sexual violence and sexual harassment now forms part of the statutory guidance. Upskirting is listed as a form of peer on peer abuse because it's a criminal offence. (PARAGRAPH 27 of KCSiE September 2019)

Gender Based Violence.

Gender based violence, also known as violence against women and girls (VAWG), can include physical and sexual abuse, harassment and bullying.

Hate Crime.

A hate crime is any behaviour that anyone thinks is based on a person's prejudice against a particular race, religion, sexual orientation, gender identity, or disability.

Mental Health.

Mental health disorders are emotional and behavioural problems that are outside the normal range for a child or young person's age or gender.

Trafficking.

Trafficking children involves the recruitment, transportation, transfer, harbouring or receipt of a child for the purposes of exploitation.

Internet Safety

Our approach to internet safety is based on the guidance from the UK Council for Internet Safety. (See Internet / E Safety Policy)

OFSTED review of Sexual Abuse in schools. April 2021

Key findings:

- Sexual abuse and online abuse are prevalent- for some children incidents are so commonplace they see no point in reporting them
- There are significant barriers to disclosure. Girls are reluctant to talk about sexual abuse, fearing reputational damage or being branded a snitch.
- Language matters: current guidance does not reflect the language the young people use, particularly for online sexual abuse. Sexting is an outdated term.
- PSHE/RE curriculum: Generally pupils are rarely positive about the PSHE they have received, they felt it was too little, too late. Staff often lack confidence in delivering the new curriculum.

Ofsted recommendations:

Zero tolerance culture where EAP will adopt a whole school approach to not putting up with it, taking it seriously, allowing time for discussion and providing training. Staff must challenge victim blaming, use of language, online sharing, snitching and must not overlook banter.

Supporting vulnerable and at risk children in conjunction with other agencies.

EAP has a dedicated Pastoral team to offer specialised support services to students and liaise with outside agencies such as MAST, SAFE Adolescent Service, CAMHS, YOS (Youth Offending Service),

EAP works closely with three key safeguarding partners, the LA, the local CCG and the Head of YOS.

EAP has been part of the DfE funded APST project and has increased its workforce to target Serious Youth Violence in Ealing.

Seeking to put in place protective factors for any child at risk.

EAP aims to provide a safe and supportive environment for all children in its care. Through a process of initial assessment upon entry, it is the intention that risk factors be identified early on and protective measures put in place. Some children may be taught 1:1. Staff are made aware of safe practices which include informing senior staff and colleagues nearby that they are teaching in this 1:1 situation. These include:

- Mandatory Relationship education, including Sex and Health Education
- PSD focus upon behaviours and emotional stability.
- Opportunities for close work with teachers and tutors
- 1:1 work with Learning Mentors
- Intensive support through Targeted Connexions Personal Adviser
- Counselling
- Support from the Safer Schools Police Officer
- Referrals to specialised agencies for preventative work, such as the SAFE Adolescent Service, Easy Drugs project, Prevent,

Ealing Alternative Provision (EAP) PSHE Programme

EAP has a comprehensive Personal and Social development Programme which contains schemes of work which encourage children to 'stay safe' e.g. drug and substance misuse, sexual health and moral dilemmas. Online safety must feature when pupils are being taught about keeping themselves safe. This included supporting pupils who work online at home for the majority of their timetables.

Through this programme and the pastoral support systems EAP engenders a climate of trust between adults and children and actively promotes a 'stay safe' culture.

The following documents are on EGfI at:

[http://www.egfi.org.uk/categories/pupil/safeguarding/child-protection/Role and duties of governors.html](http://www.egfi.org.uk/categories/pupil/safeguarding/child-protection/Role%20and%20duties%20of%20governors.html)

The DfE statutory guidance September 2022

Revised Disclosure and Barring Service guidance

These policies have been reviewed in the light of the updated statutory guidance *Keeping Children safe in Education, issued September 2023 DfE*

15 Key contacts (September 2022)

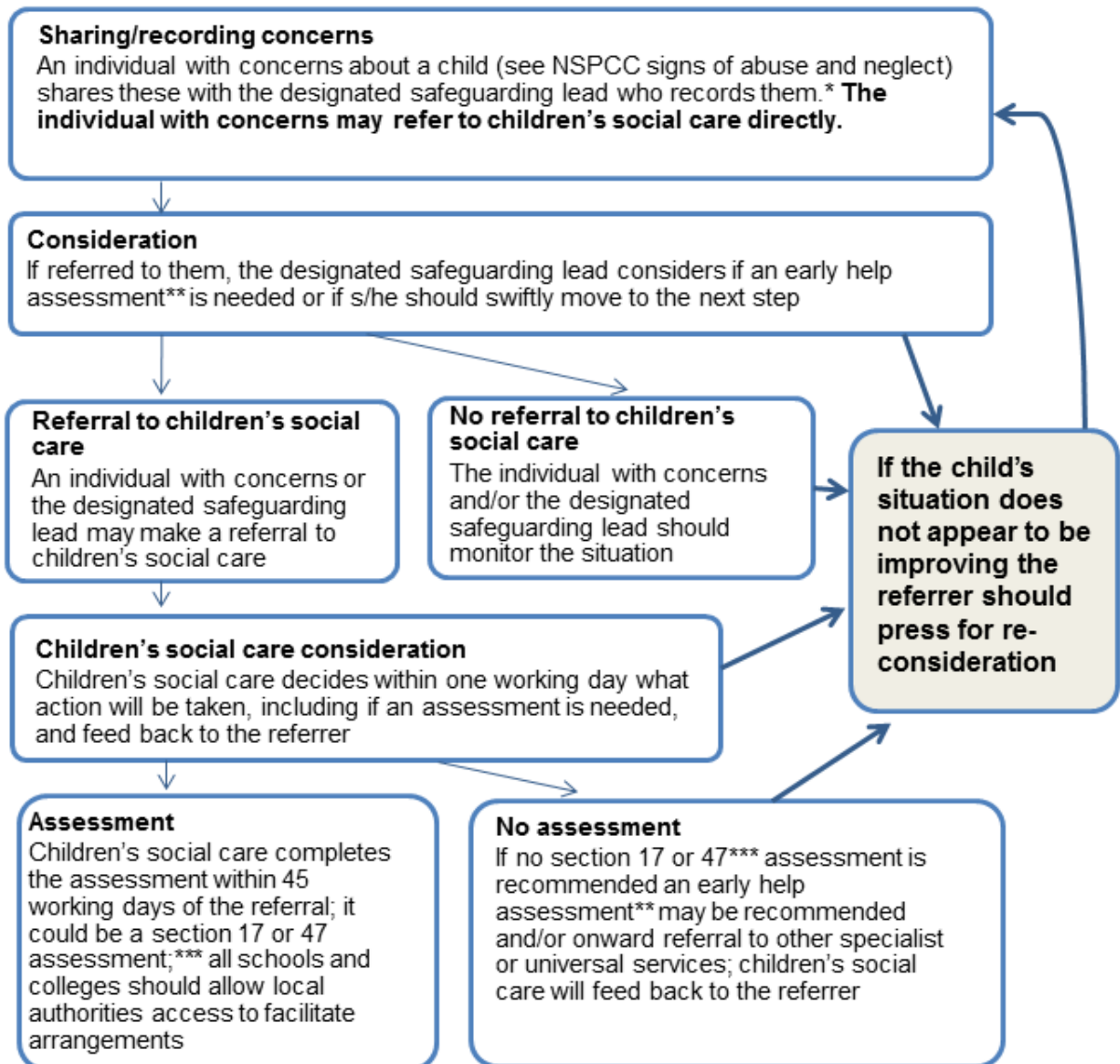
KEY CONTACTS AT SCHOOL		
	Name	Phone Number
Headteacher	Roddy Gilbert	0208 991 8570
Deputy Headteacher and DSL Designated Teacher for LAC	Dee Higgins	0208 991 8570 Out of hours contact: 07775 566 618 safeguarding @eap.ealing.sch.uk
Chairs of Management Committee	Paul Doyle / Lou Grimley	admin@eap.ealing.sch.uk
Deputy Head (Teaching & Learning)	Kellie Waterton	0208 991 8570
Deputy Head (SEN & Inclusion)	Caroline O'Connor	0208 991 8570
SENCO	Sallianne Doyle	0208 991 8570
APST Project Lead	Jennie Truman	0208 991 8570
KEY CONTACTS AT LOCAL AUTHORITY		
	Name	Phone number
Safeguarding Children Service Manager / Local Authority Designated Officer (LADO)	Natalie Cernuda	020 8825 8930 07890 940 241 asv@ealing.gov.uk
LA Prevent Officer	Nazia Matin/Paul Smith	020 8825 9212
Child Protection Duty desk		020 8825 8930
Contextual Safeguarding Lead	Catherine Imobeke	020 8825 8313
	Cat White	0208 825 5362
Safeguarding children partnership (ESCP and CEOP manager)	Steve Bourne	020 8825 9618
Schools HR	Mark Nelson	020 8825 9478
Schools HR	Maria Stock	020 8825 5130
ECIRS		020 8825 8000

Child Protection Administration (to contact CPA for advice)		020 8825 8930
Child Abuse Investigation Team (CAIT)	Police CP team	020 8246 1901

Action when a child has suffered or is likely to suffer harm

This diagram illustrates what action should be taken and who should take it when there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately.

Anybody can make a referral.



* In cases which also involve an allegation of abuse against a staff member, see part four of this guidance which explains action the school or college should take in respect of the staff member

** Where a child and family would benefit from coordinated support from more than one agency (eg, education, health, housing, police) there should be an inter-agency assessment. These assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The early help assessment should be undertaken by a lead professional who could be a teacher, special educational needs coordinator, General Practitioner (GP), family support worker, and/or health visitor.

*** Where there are more complex needs, help may be provided under section 17 of the Children Act 1989 (children in need). Where there are child protection concerns local authority services must make enquiries and decide if any action must be taken under section 47 of the Children Act 1989.

