



## Safeguarding Policy

---

July 2020

Reviewed and agreed August 2020 by: Andi Holah, Leoni Kitchin, Frederika Roberts

*To be reviewed July 2021*

**Name and job title of Designated Safeguarding Lead:** Frederika Roberts, Managing Director

## **Educate to Flourish Safeguarding Policy**

This policy applies to all staff, associates and volunteers of Educate to Flourish. It will be reviewed and updated annually by Directors.

### **1. Purpose**

The purpose of this policy is to protect children from any harm that may be caused to them. This includes harm arising from:

- The conduct of staff and associates from Educate to Flourish
- The conduct of staff within schools where Educate to Flourish staff or associates may be working and which is noticed by Educate to Flourish staff or associates.
- Harm caused by peers at school as noticed by Educate to Flourish staff or associates.
- Harm caused outside of school which is noticed by Educate to Flourish staff or associates.

The policy lays out the commitments made by Educate to Flourish and informs staff and associates of their responsibilities in relation to safeguarding.

### **2. Policy Statement**

Educate to Flourish believes that:

- children and young people should never experience abuse of any kind
- staff and associates have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them

Educate to Flourish recognises that:

- the welfare of children is paramount in all work undertaken and decisions made
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation have an equal right to 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.

### 3. What is safeguarding children?

Everyone coming into contact with children and families has a role to play in keeping them safe. *Keeping Children Safe in Education 2020* is the current guidance for schools and educational settings and lays out what is required. Educate to Flourish will work within this guidance and in line with the safeguarding policy of any school in which its staff are working in order to promote the safety and wellbeing of children and to protect them from harm.

*Working Together to Safeguard Children 2018*, which is the current multi agency safeguarding guidance for all those working with children, defines a child as anyone who has not yet reached their 18th birthday. Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Staff and associates of Educate to Flourish will always work within this definition and ensure the safety of children at all times.

#### **RECOGNISING CHILD ABUSE – TERMS AND DEFINITIONS**

All staff will be trained in Safeguarding and will aim to recognise and act upon any form of abuse. For children this means the following, as defined in *Working Together to Safeguard Children (2018)*:

- **Physical** – Any form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Sexual** – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening or not. The activities may involve physical contact, including assault by penetration, (for example, rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Children can also be sexually exploited. Criminal exploitation and potentially violent crime occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim

may have been sexually exploited even if the sexual activity appears consensual. Criminal exploitation does not always involve physical contact; it can also occur using technology.

- **Neglect** – The persistent failure to meet a child’s basic physical and /or psychological needs, likely to result in serious impairment of the child’s health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
  - Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
  - Protect a child from physical and emotional harm or danger.
  - Ensure adequate supervision (including the use of inadequate caregivers).
  - Ensure access to appropriate medical care or treatment.
  - It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.
- **Emotional** - The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (include cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

In addition to this, children may also be abused through trafficking, radicalisation, domestic abuse (either within their household or within their own relationships) and through female genital mutilation (FGM). A child living in a household where there is domestic abuse is deemed to be suffering emotional abuse (see Emotional Abuse above).

#### **4. Dealing with disclosures or concerns about children and young people**

A member of Educate to Flourish staff, hearing a disclosure directly (or indirectly via another child or member of staff) or recognising any of the above abuse will report it directly to the Designated Safeguarding Leads (DSLs) both within the school where they are working, and within Educate to Flourish without delay.

The DSL within Educate to Flourish will liaise with the DSL within the school as required to ensure appropriate action is taken.

Educate to Flourish staff will work with the school DSL should a referral to external agencies, e.g. Children's Social Care or the Police, be required.

Safety of the child is paramount. In rare incidents where Educate to Flourish staff feel a child remains unsafe, or do not agree with action taken by the school DSL, they will use professional challenge and escalate this, via the Educate to Flourish DSL, to the Head Teacher and to the Local Authority if required, until they are satisfied that action has been taken to ensure the child is safe.

## 5. **Allegations Management**

Allegations of abuse by members of staff or volunteers working with children come under the government's statutory Allegations Management process. All concerns about professionals' behaviour towards children, whether their own children or others', must be shared, whether or not the professional works or volunteers directly for Educate to Flourish.

- Any allegation made against Educate to Flourish staff, or allegations made to, or by, Education to Flourish staff against staff within the school where they are working, will be reported directly to the Head Teacher of the school and to the Designated Safeguarding Lead of Educate to Flourish. Information will not be discussed with other members of staff.
- Educate to Flourish will take all allegations seriously and will report to and discuss with, the Local Authority Designated Officer (LADO) in whichever area staff are working, if required, so that they can be fully investigated at the correct level. The Government's Allegations Management process is mandatory and will be used for any allegation made where the allegation suggests that the person has:
  - Harmed or may have harmed a child
  - Possibly committed a criminal offence against or related to a child
  - Behaved towards a child in a way that indicates they may pose a risk of harm to children.

For allegations against Educate to Flourish staff, the DSL (Managing Director) will, with the advice from the LADO, decide on whether the allegation meets the thresholds. If so, Educate to Flourish will work with the LADO, attending the multi-agency Allegations Management meeting involving police, children's social care and any other employer to determine the way forward. Educate to Flourish will take the LADO's advice on when and how the individual should be informed so that evidence may be preserved, and children protected.

Any allegation made against the DSL within Educate to Flourish, will be referred to the one of the other directors.

## **6. Recording concerns and information sharing**

The Educate to Flourish DSL will record the actions of Educate to Flourish staff and associates in safeguarding children. For example; referrals to the school DSL, allegations reported/made and actions taken, challenges to a school's safeguarding practice and referrals to any external agency including the LADO. Records will be securely kept either in paper form or electronically and will be kept in a separate child protection file for each child or member of staff, rather than in one 'concern log'.

Records will be kept in line with the NSPCC's Child Protection Record Retention and Storage Guidance 2020 and will include:

- the date and time of the incident/disclosure
- the date and time of the report
- the name and role of the person to whom the concern was originally reported and their contact details
- the name and role of the person making the report and their contact details
- the names of all parties who were involved in the incident, including any witnesses
- the name, age and any other relevant information about the child who is the subject of the concern
- what was said or done and by whom
- any action taken to investigate the matter
- any further action taken (such as a referral to children's social care being made)

While being mindful of confidentiality and General Data Protection Regulation (GDPR), information pertaining to the Safeguarding of children should be shared to protect a child. Information regarding safeguarding of children in a school where Educate to Flourish staff are working, will therefore always be shared with the DSL of the school in line with the school's own policy.

Any records shared, either within Educate to Flourish or externally, will be shared confidentially using passwords and encryption when sharing electronic files, or by hand or secure postage if paper.

## **7. Child Protection records, retention and storage**

Safeguarding records, made in line with the above, will be kept until the child is 25 (this is seven years after they reach the school leaving age) in line with Information and Records Management Society (IRMS), 2016. Files relating to sexual abuse will be kept indefinitely in line with current requirements of the Independent Investigation into Child Sexual Abuse (IICSA). Changes to these requirements will be acted upon as they are released.

Information relating to an allegation against an adult will be kept for 10 years or until normal retirement age (65), whichever is the longer (IRMS, 2016; Department for Education, 2018)

Where information from a member of staff at Educate to Flourish has led to legal proceedings, Educate to Flourish will seek legal advice regarding the retention period for those records.

Educate to Flourish staff will be bound by the Acceptable User Policy (see **Appendix A**) for electronic use including using personal computers to make and send records to the DSL who will store them in a secure Educate to Flourish area.

## **8. Staff responsibilities**

### **Conduct**

Educate to Flourish staff and associates will contribute to creating and maintaining an environment that prevents safeguarding issues and promotes the implementation of the Safeguarding Policy.

Staff and associates will act in line with the Educate to Flourish Code of Conduct which they will read and sign for annually. The Code of Conduct can be found at **Appendix B** of this policy.

Educate to Flourish staff and associates will pre-read a school's Safeguarding Policy prior to starting work. On entering the school for the first time, Educate to Flourish staff and associates will make themselves known, provide ID and read any additional Safeguarding information provided on sign in. Staff ascertain who the duty DSL in school is for that day and ensure they are clear on how to report concerns.

### **Photography and Sharing Images**

Educate to Flourish staff will ensure that any images of their work within the school which include children, are used only in line with the school's policy on the use of imagery and that parental consent has been sought by the school for such images to be used.

Images of children will be taken only using an Educate to Flourish mobile phone or SD card and in line with Educate to Flourish's Acceptable User Policy, any images used will be for official purposes only, will not include the names of children and will be uploaded onto Educate to Flourish social media.

Associates of Educate to Flourish will not take images of children in school.

### **Managing Complaints**

Any complaint made about Educate to Flourish staff or associates will be referred to the Managing Director of the company for resolution. Where a complaint is against the Managing Director, the complaint should be directed to one of the other directors.

Educate to Flourish will endeavor to resolve the complaint using a stage 1, informal process to include discussion and agreed action between the company and the complainant.

Should this not be possible, a stage 2, formal process will be instigated, ultimately with the potential for a Panel meeting of the Directors with the complainant and their representative.

Should this not result in the resolution of the complaint, the complaint will be referred to the Office of the Regulator of Community Interest Companies.

Where a complaint constitutes an allegation of abuse of a child either by action or omission, the Allegations Management process outlined at Part 5 of this policy will be used.

### **Whistle Blowing**

Educate to Flourish promotes an open culture where staff and associates can raise concerns in the knowledge that they will be acted upon. Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It provides the right for a worker to take a case to an employment tribunal if they have been victimised at work or they have lost their job because they have blown the whistle.

Personal grievances and complaints are not usually covered by whistleblowing law and would fall within the Complaints Procedure. However, where an Educate to Flourish member of staff or associate who makes a disclosure reasonably believes that they are acting in the public interest, and believes that their disclosure shows a tendency for criminal offences (e.g. fraud), failure to comply with an obligation in law, a miscarriage of justice, endangering someone's health and safety, damage to the environment or covering up a wrongdoing, Educate to Flourish will respond quickly and sensitively.

Any disclosures falling under whistle blowing should be reported to the Managing Director of Educate to Flourish.

### **Health and Safety**

Educate to Flourish staff and associates will work within the policy for health and safety in any school where they are carrying out their duties and will not put themselves in a position of danger.

They will ensure that all reasonable steps are taken to ensure the health, safety and welfare of those where they are working, and comply with the school's safe working procedures for staff and pupils.

Staff and associates of Educate to Flourish will ensure that they read, understand and comply with the school's fire procedures and are clear on action to be taken in the event of lock down procedures being implemented (for example in the event of an incident of terrorism).

Where Educate to Flourish staff or associates notice something unsafe within the school, they will bring this to the school's attention without delay.

Educate to Flourish staff and associates will ensure they notify the Managing Director of Educate to Flourish should there be an incident where they did not feel safe.

## **9. Safer Recruitment**

In line with *Keeping Children Safe in Education 2020*, all staff employed by Educate to Flourish will be recruited using safer recruitment procedures.

Educate to Flourish will ensure that:



- All advertisements include a safeguarding statement in order to deter unsuitable people
- Application forms are completed (and signed at interview if electronic), and CVs are not accepted
- References are sought prior to interview wherever possible
- One person on each interview panel is accredited in Safer Recruitment and champions safeguarding during the interview process
- Offers of employment or contracts are always conditional on a clear DBS disclosure and receipt of any outstanding references.

Associates of Educate to Flourish will be DBS checked (including a check of the Barred List) and will be known to the one of the directors.

## **10. Induction, Training, Supervision and Support**

### **Induction**

All staff and associates of Educate to Flourish will, prior to working for the company in a school, meet with or engage in a phone conversation with the Educate to Flourish DSL and receive a safeguarding induction. This will include reading the Educate to Flourish Safeguarding statement and policy, reading Part 1 of *Keeping Children Safe in Education 2020*, reading the Acceptable User Policy and the Code of Conduct for staff. Staff and associates will be expected to sign to say they have been provided with these policies and statutory guidance and that they have read them.

In addition to this, the Educate to Flourish DSL will run through the process expected of a member of staff or associate to familiarise themselves with the school in which they will be working and ensure they are clear on their safeguarding responsibilities.

### **Training**

All staff and associates of Educate to Flourish will carry out basic safeguarding children training at least every 3 years. Where a member of staff or associate works in a school in a different capacity and undertakes this training as part of that role, this will be accepted on production of the training certificate.

The Educate to Flourish DSL will keep up to date training records as required.

The DSL will undertake more detailed (sometimes called Level 3) training every 2 years commensurate with their role and job description which can be found at **Appendix C**.

### **Supervision and Support**

Where a member of staff or associate has witnessed, had to report, manage or refer a safeguarding concern, the company will put in place additional reflective safeguarding supervision as required in order to address any concerns or issues of wellbeing for the member of staff.

## **11. Associated policies**

Code of Conduct for Educate to Flourish staff and associates – **Appendix A**

DSL Job Description – **Appendix B**

Acceptable User Policy – **Appendix C**



## Acceptable User Policy – code of conduct for online activity and electronic devices

---

July 2020

This policy is intended to clarify online IT use for Educate to Flourish staff and associates working in schools on behalf of the company.

### 1. Introduction

*Keeping Children Safe in Education 2020*, post Covid19 has further highlighted the requirement for safe online use by schools in these times of increased use of electronic communication.

Boundaries online and when using electronic devices have always been important but never more so. A high proportion of allegations made against staff working in schools relate to online and electronic concerns.

### 2. Online activity:

Staff and associates of Educate to Flourish will:

Read and understand a school's IT agreement before using any IT equipment at the school.

Post online, or send in a message, only professional and responsible information in order to maintain the reputation of the company and the schools in which they are working.

If linking personal media accounts with Educate to Flourish social media, ensure personal posts are not likely to bring the company into disrepute.

Ensure no photographs of children in schools are uploaded directly onto personal social media sites but may appropriately share posts from the Education to Flourish or school social media sites.

Follow the school's policy on compliance with the General Data Protection Regulations (GDPR).

Ensure any virtual meetings with the schools in which staff and associates are working are set up appropriately with an agreement not to record and use of a waiting room in order to prevent unwanted attendees.

### **3. Contact with children**

Educate to Flourish staff and associates will not use any form of electronic communication for contacting pupils. If this is necessary, the school will be asked to contact them via the school's own system.

Staff and associates will not invite children from schools where they are working onto their personal social media or accept invitations onto the social media of children or young people.

Staff and associates will not invite children into chat rooms or engage in communication with them via apps e.g. tik tok.

Staff and associates will not use personal email addresses of children to communicate with them.

### **4. Mobile phones**

Staff and associates will only use personal mobile phones during breaks in the working day, keeping them on silent at other times, unless by prior agreement.

Associates of Educate to Flourish will not take photographs of children in schools. Staff will use only Educate to Flourish equipment to take photographs or videos (and will use dedicated Educate to Flourish SD cards for any photographs or videos taken on other equipment) and will ensure that any photographs or videos of their work in schools which might include children, are taken in line with the school policy and where the school has the appropriate parental consent.

Staff and associates will not provide children with their personal mobile phone number or request mobile phone numbers from children.

### **5. Computers, tablets and Laptops**

Staff and associates will usually use their own computer/tablet or laptop for Educate to Flourish work. They will ensure that any screensaver is appropriate and will not cause offence and that personal photographs, memes or pictures that could be misinterpreted cannot be seen.

Computers, tablets and laptops should be screen locked before leaving the room even for a short time.

### **6. Confidential Data**

Confidential school information, pupil information or safeguarding data related to the work of Educate to Flourish staff and associates, for example after having reported a concern, will be stored on a device which is encrypted or protected with a strong password and passed securely to the DSL in school and in Educate to Flourish. The record on a personal device will then be deleted.

Staff and associates will report immediately any accidental loss of personal or sensitive information so that appropriate action can be taken.



# Staff and Associate Code of Conduct

---

July 2020

## 1. Introduction

Educate to Flourish staff and associates are accountable for the way in which they exercise authority, manage risk, use resources and safeguard children. As such, they will be seen by children as trusted adults, and therefore are expected to take reasonable steps to ensure their safety.

This code of conduct outlines the expected behaviour for Educate to Flourish staff and associates while representing the company in any educational setting.

## 2. Standards

Educate to Flourish staff and associates are expected to uphold the highest of standards while working in schools. This includes being responsible for their own actions and behaviour and avoiding any conduct which would lead a reasonable person to question their motivation and intentions.

Staff and associates should work in an open and transparent way and should apply the same standards regardless of culture, gender, disability, language, ethnicity, religion, or sexual orientation.

Staff and associates should not consume or be under the influence of alcohol or any other substance, including medication which has been prescribed for them, and which may affect their ability to care for children.

Staff and associates must not use their position to gain access to information for their own advantage, use their position to intimidate, undermine or threaten pupils and their families or to engage in a sexual relationship with a pupil.

Staff and associates should ensure they are always polite and courteous and should comply with the expectations also required by the school where they are working. They should avoid language which could be misinterpreted, avoid making or encouraging others to make, comments which could be interpreted as sexual, discriminatory or demeaning.

Staff and associates should avoid discussing their own personal or sex life in front of or in the hearing of pupils.

### **3. Personal Appearance**

Staff and associates of Educate to Flourish should dress in a way that is professional and appropriate to their role. They should avoid revealing clothes or clothes which promote a sexualised image or could be seen as offensive.

Clothes or jewellery with contentious logos or brand names should be avoided.

### **4. Gifts**

Most staff within schools and educational settings are given small gifts by children from time to time. However, staff and associates of Educate to Flourish should not accept gifts which could be seen as a bribe or lead to the provider of the gift to expect treatment which is preferential. When in doubt, staff and associates should follow the school's Gift and Rewards procedures and also register any gifts with the Managing Director of Educate to Flourish.

Where Educate to Flourish staff and associates feel it is appropriate to give gifts to those they have been working with, these should be small and inexpensive. In the unlikely event of staff and associates providing gifts to children, these should be only through an agreed reward system within the school.

### **5. Social Contact with pupils**

Social contact outside of the workplace with children who are pupils of the school where a member of staff or associate of Educate to Flourish are working should not take place outside of any genuine and pre-existing friendships with their parents.

Should a pupil try to initiate such contact, perhaps because of an infatuation or crush on the member of staff or associate, this must not be acted upon and should be brought to the attention of the school and the DSL for Educate to Flourish.

Where a member of staff or associate becomes aware of such contact between other members of staff and pupils from the school, this should be brought to the attention of the school.

### **6. Physical Contact**

The Department for Education and Ofsted do not advocate a no touch policy for children in schools. However, any touch or physical contact with a child should be appropriate to the age of the child and the situation.

Any touch can be mis-interpreted by the child or witness, and staff and associates should endeavour to explain to a child why touching them might be necessary, for example to assess an injury.

Wherever possible, staff and associates should seek consent from a child before engaging in any physical contact. For example, asking whether they can touch the shoulder of a child who is distressed.

Staff and associates should never engage in physical 'horse play' games with children or touch them in a way that is sexualised or indecent.

Staff and associates should not attempt to restrain a child physically under any circumstances and should seek assistance from someone within school who is trained to do so.

### **7. Responsibility for pupils**

Staff and associates of Educate to Flourish should not be participating in intimate care for pupils.

Staff and associates of Educate to Flourish should not put themselves in a position where they are in a one to one situation with a child, or in sole responsibility for a child in school.

Educate to Flourish staff or associates should not transport children from a school in which are working in their private cars or vehicles.

### **8. Making professional judgements**

Any policy or procedure is unable to cover every eventuality. There may therefore be times when a member of staff or associate for Educate to Flourish must make a judgement on what action to take and this may contravene guidance. Often these situations are immediate and there is little time to think.

The child's safety should always be paramount in any decision made.

Following any action, the member of staff or associate should record their action and the thought process behind it and discuss it with the DSL in Educate to Flourish and with the school.

## Appendix C – DSL Role Description



### Designated Safeguarding Lead – role description

---

July 2020

**Job Title:** Educate to Flourish Designated Safeguarding Lead (DSL)

**Reports to:** Directors

**Responsible for:**

- Ensuring safeguarding compliance and implementation of Educate to Flourish Safeguarding policy.
- Ensuring that all staff and associates are compliant with safeguarding statutory responsibilities and best practice.

#### **Role and Responsibilities**

To lead on ensuring Educate to Flourish complies with statutory responsibilities and the policies and procedures of the schools in which its staff and associates are working.

To keep up to date with current government guidance and practice in leading safeguarding to ensure continued forward-thinking practice and to be aware of, and ensure compliance with, Ofsted expectations for safeguarding.

To regularly remind staff of safeguarding and provide them with any updates to legislation in order to promote a strong safeguarding culture.

To provide a safeguarding induction for any new members of staff or associates.

To provide regular advice and support and be the initial contact point for staff and associates raising safeguarding concerns regarding children within the school where they are working.

To receive and act upon any complaints from either staff or schools where they are working and to follow the complaint through to completion.

To receive and act upon any whistle blowing concern, liaising with the member of staff in a timely way.

To liaise with DSLs in schools regarding safeguarding issues raised by Educate to Flourish staff and associates and to challenge the safeguarding of children where required.

To manage allegations against any members of staff and associates of Educate to Flourish, liaising with the LADO in the relevant area, attending the Allegations Management meeting and completing, or arranging for the completion of any disciplinary investigations arising from the allegation as required.

To assist staff and associates who have raised an allegation against a member of staff within a school where they are working, ensuring that the highest person in school not implicated in the allegation has been informed and assisting with the allegations management process as required.

Providing reflective safeguarding supervision as required to those members of staff and associates who have witnessed abuse in school, reported or referred concerns or either raised an allegation or had an allegation made against them.

Making and keeping appropriate safeguarding records which are in line with guidance, shared appropriately and kept securely for the relevant timescales.

Keeping training records and ensuring that all staff and associates have received the correct level of safeguarding training at the correct intervals.

Ensuring that the Educate to Flourish Safeguarding policy and related policies are seen by directors, staff and associates annually and are updated.