



The Greenhouse Hyflex Academy

Safeguarding and Child Protection Policy

2025-26

DSL and Deputy Contact Details

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The Greenhouse Hyflex Academy is committed to Safeguarding and promoting the welfare of children.

1. Aims, Introduction and Legislation

The Greenhouse Hyflex Academy aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues
- Head Teacher is responsible to ensure that all education staff practice is in line with national and local requirements.

The Greenhouse recognises its duty under the Education Act 2002, Children Act 1989 & 2004 and Local Government Act 2000 to make arrangements to ensure that tasks are carried out with a view to safeguarding and promoting the welfare of children. The objective of the procedures within this policy are to ensure that appropriate action is taken immediately where it is believed a child may be at risk or it is alleged that a child is suspected of being abused. The prime concern at all times must be the interests and safety of all members of The Greenhouse community including the children, staff and visitors.

Safeguarding and promoting the welfare of children is everyone's responsibility. Schools and colleges and staff are an important part of the wider safeguarding system for children. It is defined in 'Working together to safeguard children' (2023) as:

- **PROVIDING** help and support to meet the needs of children as soon as problems emerge
- **PROTECTING** children from maltreatment, whether that is within or outside the home, including online
- **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
- **PROMOTING** the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- **TAKING ACTION** to enable all children to have the best outcomes in line with the outcomes set out in the <https://www.gov.uk/government/publications/childrens-social-care-national-framework>

For the purpose of clarity, a child is defined as anyone who has not yet reached their 18th birthday. Although a child may have reached 16 years of age, be living independently or is in further education, in hospital or the secure estate, this does not alter the child's status or entitlements to services or protection.



Working Together to safeguard Children 2023 reflects the importance of a child-centred approach within a whole family focus. This is fundamental to safeguarding and promoting the welfare of every child and all practitioners should follow the principles of the Children Acts 1989 and 2004. These Acts make clear that the welfare of children is paramount and that they are best looked after within their families, with their parents playing a full part in their lives, unless compulsory intervention in family life is necessary. Children are clear about what they want from an effective safeguarding system:

Children have said that they need:

- **vigilance:** to have adults notice when things are troubling them
- **understanding and action:** to understand what is happening; to be heard and understood; and to have that understanding acted upon
- **stability:** to be able to develop an ongoing stable relationship of trust with those helping them
- **respect:** to be treated with the expectation that they are competent rather than not
- **information and engagement:** to be informed about, and involved in procedures, decisions, concerns and plans
- **explanation:** to be informed of the outcome of assessments, and decisions and reasons when their views have not met with a positive response
- **support:** to be provided with support in their own right as well as a member of their family
- **advocacy:** to be provided with advocacy to assist them in putting forward their views
- **protection:** to be protected against all forms of abuse, exploitation, and discrimination, and the right to special protection and help if a refugee

The Greenhouse follows local Safeguarding Children Board's/Safeguarding Partnership policies, procedures, guidance and protocols and the guidance laid out in current DfE/HM Government guidance:

- Keeping Children Safe in Education (2025)
- Working Together to Safeguard Children (2023)
- What to do if you're worried a child is being abused (2015)
- Information Sharing (2018)
- Responding to Incidents of Sexting (UKCCIS) (2016)
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006
- Statutory guidance on the Prevent duty (incorporating the Channel Duty)

This policy applies to all staff (including bank staff, students on placements and volunteers), children and visitors and should be read in conjunction with the Keeping Children Safe in Education 2025 – Part One / Annex A

September 2025

Fiona Conde



It is The Greenhouse's policy that:

- All children that attend The Greenhouse will be protected from harm.
- All children grow up in an environment that is consistent with the provision of safe and effective care.
- The Greenhouse will work in partnership with all relevant agencies to ensure that children are effectively protected from harm.
- All staff at The Greenhouse are made aware of the Safeguarding policy and all associated procedures. The implementation of the procedures can only be effective when supported by good practise, and the exercise of professional skill and judgement, based on thorough assessment, supported by evidence and critical analysis.
- The implementation of effective recruitment (Safer Recruitment) and H.R procedures including checking all staff are safe to work with children.
- All staff are given appropriate and ongoing training/CPD to enable them to do their job effectively.

Key Principles for our children are that they:

- Enjoy the best possible health and are free from abuse, neglect, victimisation and exploitation.
- Have a comprehensive range of learning opportunities.
- Have access to play, leisure, sporting and cultural activities.
- Are listened to, treated with respect, and have their race and cultural identity recognised.

The role of The Greenhouse is:

Everyone who comes into contact with children and their families/carers has a role to play in safeguarding children. Education staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. (Source: Keeping Children Safe in Education 2025)

Good Practice Aims

All staff must be alert to the possibility that the child in their care may have, or may in the future, be abused. They must also be aware that abuse, neglect and exploitation can occur in the home, perpetrated by a child or by a member of staff.

The first principle in all situations is that the welfare and protection of the child is paramount. Any suspicions of abuse, neglect and exploitation must be reported in order for decisions to be made regarding a possible investigation. Reporting is a staff responsibility; investigation is the responsibility of the Local Authority of the area in which the home is situated. Staff must ensure that they are familiar with these procedures.



All allegations must be taken seriously and the correct procedures followed in a timely manner (same working day). Staff have a responsibility to deal with any disclosures sensitively, and listen carefully to a child who discloses abuse, neglect or exploitation, while not asking leading or probing questions which may hamper any subsequent formal investigation. In line with the 6 R's in relation to Safeguarding, staff must not guarantee secrecy and should inform, and reassure the young person that the information will be shared whether disclosure is past or present. Staff may suffer a conflict between a promise to the child and the procedure. An atmosphere of trust must be developed in which the child understands that the staff member will deal with the information in a way which protects their best interests. Clear information must be given to the child as to what will happen as a result of the disclosure however, guarantees can be given of a sensitive and supportive approach.

2. Recognition and Categories of Abuse, Neglect and Exploitation

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex B of Keeping Children Safe in Education (2025).

Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by unknown others e.g. via the internet. They may be abused by an adult or adults, or another child or children. Both mental and physical health are relevant to safeguarding.

Physical Abuse

Physical abuse 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.

Emotional Abuse

Emotional abuse is 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 to 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 the 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 (including online 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.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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); failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child's basic emotional needs.

Supporting children at risk of, or experiencing, harm outside the home

Some children experience abuse, neglect and exploitation outside the home. This is often referred to as "extra-familial harm" (Working Together To Safeguard Children, 2023). Harm can occur in a range of extra-familial contexts, including school and other educational settings, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.

Child Sexual Exploitation (CSE)

CSE involves exploitative circumstances and relationships where young people receive something in return for engaging in sexual activities (for example food, drugs, mobile phone, alcohol, gifts, accommodation, money or sometimes simply affection). Sexual exploitation can take many forms including 'consensual' relationships where sex is exchanged for affection or gifts to serious organised crime by gangs and groups. The main factor that denotes exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves different degrees of intimidation and coercion including unwanted pressure from peers to have sex, sexual bullying, online bullying and grooming. It is important to note that some children and young people who are being sexually exploited do not exhibit any external signs of this abuse.

Child sexual exploitation may occur without the child being aware of events, or understanding that these constitute abuse.



Child sexual exploitation is never the victim's fault, even if there is some form of exchange; all children and young people under the age of 18 years have the right to be safe and should be protected from harm.

For further information, refer to DfE (2015) What to do if you're worried a child is being abused. <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Child sexual exploitation: definition and guide for practitioners (DfE 2017) <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Online Exploitation

All young people are at risk from online exploitation and may be unaware that this is happening. Online exploitation includes the exchange of sexual communication or images and can be particularly challenging to identify and respond to. Children, young people and perpetrators are frequently more familiar with, and spend more time in, these environments than their parents and carers.

Online child sexual exploitation (CSE) allows perpetrators to initiate contact with multiple potential victims and offers a perception of anonymity. Where exploitation does occur online, the transfer of images can quickly and easily be shared with others which makes it difficult to contact the potential for further abuse.

Children may be perpetrators of abuse

It must be recognised that children may also be perpetrators of abuse, sometimes at the same time as being abused themselves.

Further information: Child sexual exploitation: definition and guide for practitioners (DfE 2017) <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Trafficking

According to The United Nations Convention against Transnational Organised Crime (the Palermo Protocol) describes trafficking as 'the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of use of force or other forms of coercions, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation'.

At a minimum, exploitation includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude of the removal of organs.

For further information, refer to DfE and Home Office (2011) Guidance: Safeguarding children who have been trafficked



<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

Child on Child Abuse

All staff are aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise
- causing physical harm;
- sexual violence and sexual harassment
- gender-based violence
- sexting (also known as youth produced sexual imagery); initiation-type violence and rituals.

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child on child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At The Greenhouse, we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the School’s Behaviour Policy.

Occasionally, allegations may be made against students by others in The Greenhouse, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a student, some of the following features will be found.

The allegation:

- is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students at The Greenhouse
- indicates that other students may have been affected by this student
- indicates that young people outside The Greenhouse may be affected by this student

It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.



Guidance includes:

- the importance of explaining to children that the law is in place to protect rather than criminalise them
- the importance of understanding intra-familial harms, and any necessary support for siblings following incidents
- the need for schools and colleges to be part of discussions with statutory safeguarding partners.

In December 2017 the DfE released advice for schools and colleges on how to prevent and respond to reports of sexual violence and harassment between children. Our staff and volunteers understand the guidance and our response to such abuse, and that children can abuse their peers in this way.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or children to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sexual Violence and Sexual Harassment

Guidance on 'Sexual Violence and Sexual Harassment' between children in schools and colleges is referenced in Keeping Children Safe In Education 2025. This school will treat sexual violence and sexual harassment in line with any other child protection concern and refer onto relevant agencies as stated within our policy.

Sexual Violence refers to criminal acts; rape, assault by penetration and sexual assault, as defined by the Sexual Offences Act 2003. Sexual harassment is described as 'unwanted conduct of a sexual nature'. Importantly, the definition of consent is stated and should help students begin to understand more clearly.

This school accepts that Sexual violence and sexual harassment can occur between two children of any sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, it may also include initiation/hazing they can occur online and offline (both physical and verbal) and are never acceptable. It is important in our setting that all



victims are taken seriously and offered appropriate support in a non-judgemental way and on a case-by-case basis. Staff will act in the best interest of the child.

In light of this this will consider;

- The wishes of the victim in terms of how they want to proceed.
- The nature of the alleged incident
- The ages of the children involved
- Any power imbalance between children
- Is the incident a one-off or a sustained pattern of abuse
- Are there ongoing risks to the victim, other children or staff
- Contextual safeguarding issues
- The rights of children to receive an education

This Greenhouse will have a whole school approach in;

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia. Dismissing or tolerating such behaviours risks normalising them.

Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Research states that disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- The potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs;
- Communication barriers and difficulties overcoming these barriers.

Established research found that children who are Lesbian, Gay, Bi, or Trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

The Greenhouse will ensure that designated school staff understand consent. It will be especially important if a child is making a disclosure that suggests they might have been raped.

It is The Greenhouse ethos to see sexual violence and sexual harassment in the context of developing a community safeguarding culture, where sexual misconduct is unacceptable, and not ‘banter’ or inevitable part of growing up. It is recognised that these issues are likely to occur particularly in our setting, but they are challenged and discussed by education staff immediately and then followed up to educate our students on the law and unacceptable behaviour.



The Greenhouse has developed effective programmes of personal, social and health education (PSHE) and sex and relationships education (SRE) to support our students in understanding safeguarding issues. This curriculum also supports students in how they can raise a concern they may have about themselves, a friend or peer; and learn to recognise and develop healthy and respectful relationships, avoiding stereotypes and promoting equality. Students are taught that sexual violence and sexual harassment is always wrong.

Sexting

Sexting is a significant issue for older teenagers and involves the sharing of indecent images of themselves with others. It may be the intention for the image to be shared only with one person, but invariably these pictures or videos are shared across the internet. Such images can be a part of the early stages of grooming, especially when the potential victim has only 'met' the abuser online.

Although sexting is becoming a widespread phenomenon, it is illegal to send or be in possession of indecent images or videos of people under 18 years (Protection of Children Act 1978 and Criminal Justice Act 1988).

The Law

Making, possessing and distributing any imagery of someone under 18 years which is indecent is illegal. This includes imagery of yourself if you are under 18.

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person
- a topless girl
- an image which displays genitals, and
- sex acts including masturbation
- indecent images may also include overtly sexual images of young people in their underwear

These laws weren't created to criminalise young people, but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. The National Police Chiefs' Council (NSPCC) is clear that "youth-produced sexual imagery should be primarily treated as a safeguarding issue".

The Greenhouse may respond to incidents without involving the police. However, in some circumstances the police must always be involved.

Crime recording

When the police are notified about youth-produced sexual imagery, they must record this as a crime. The incident is listed as a crime, and the young person is the suspect. This is, however, not the same as a criminal record.



Every crime reported to the police must have an outcome code. The NSPCC, Home Office and the DBS have agreed a new outcome code for youth-produced sexual imagery.

Outcome 21

Outcome code 21 allows the police discretion not to take further action if it is not in the public interest, even though there is enough evidence to prosecute. Although recorded by the police, using this outcome code is likely to mean the offence would not appear on a future Enhanced DBS check, although not impossible, as that disclosure is a risk-based decision. Schools can be assured that the police have the discretion they need not to adversely impact young people in the future.

Handling Sexting Incidents

In August 2016 the UK Council for Child Internet Safety (UKCCIS) published non-statutory guidance on managing incidents of sexting by under-18s. Over 200 organisations were involved in creating the guidance, including the internet industry, government (Home Office and DfE), children's charities, UK Safer Internet Centre, National Crime Agency (including Child Exploitation and Online Protection Centre (CEOP)), Police, and teachers' groups.

The UKCCIS guidance is non-statutory, but should be read alongside 'Keeping Children Safe in Education 2025'.

School Process:

- Refer to the Designated Safeguarding Lead
- DSL meets with the young people involved
- **Do not view the image unless it is unavoidable**
- Discuss with parents/carers, unless there is an issue where that's not possible
- Any concern the young person is at risk of harm, contact safeguarding and/or the police

Always refer to the police or safeguarding if incident involves:

- an adult
- coercion, blackmail, or grooming
- concerns about capacity to consent
- images show atypical sexual behaviour for the child's developmental stage
- violent acts are depicted
- image shows sex acts and includes a child under 13 years
- a young person at risk of immediate harm as a result of the disclosure (for example, self-harm or suicide)

Voyeurism

The Criminal Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women



are wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders." Changes to the Voyeurism (Offences) Act 2019 include criminalising the act of 'up skirting'.

Domestic Violence and Abuse

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between individuals aged 16 years or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can include, but is not restricted to: physical, psychological, sexual, financial or emotional. Controlling behaviour includes a range of actions designed to make a person inferior and/or dependent by isolating them from sources of support and exploiting their capacities for personal gain depriving them of independence and escape by regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation that is used to harm, punish or frighten their victim. This can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

For further information, refer to Home Office (2018) Guidance: Domestic violence and abuse <https://www.gov.uk/guidance/domestic-abuse-how-to-get-help>

Homelessness

Our staff understand that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Our designated safeguarding lead (and deputies) are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. We understand that a referral into children's social care where a child has been harmed or is at risk of harm may still be made to Children's Services.

We are aware that indicators may be:

- household debt
- rent arrears
- domestic abuse
- anti-social behaviour
- the family being asked to leave a property

We recognise in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a level of intervention and support.

Further explanation is found at Homeless Reduction Act Factsheets

<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

Honour Based Abuse (FORCED MARRIAGE, FGM AND BREAST IRONING)

So-called 'honour-based' abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female



Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Our staff/volunteers understand that abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. If our staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they will speak to our designated safeguarding lead (or deputies).

Female Genital Mutilation (FGM)

FGM is illegal in England and Wales under the FGM Act 2003. This Act introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report ‘known’ cases of FGM in under 18s which they identify in the course of their professional work, to the police. The Serious Crime Act 2015 has strengthened further the legislation on FGM.

FGM is a form of child abuse and violence against females. FGM involves procedures that include the partial or total removal of the external female genital organs for cultural or non-therapeutic reasons. The practice is exceedingly painful and has serious health consequences both at the time when the mutilation is carried out as well as in later life. The practice is not medically necessary and is not required by any main religion. It is a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

If you discover that FGM has taken place or a student is at risk of FGM

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a student under 18 must themselves immediately report this to the police. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate, as well as reporting this on the education provision’s recording system.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL immediately and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

For further information, refer to Home Office & DfE (2016) Multi-agency statutory guidance on female genital mutilation
<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>



Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. Information for school and residential children's homes can be found on the NSPCC website. The government also provides broad guidance on abuse issues via the GOV.UK website:

bullying including online bullying

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

drugs

<https://www.gov.uk/government/publications/drugs-advice-for-schools>

faith abuse

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

forced marriage

<https://www.gov.uk/forced-marriage>

gangs and youth violence

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

harmful sexual behaviour framework (NSPCC)

<https://learning.nspcc.org.uk/research-resources/harmful-sexual-behaviour-hsb-framework-audit>

mental health

<https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>

preventing radicalisation

<https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>

<https://www.educateagainsthate.com/signs-of-radicalisation/>

sexual violence and sexual harassment between children in schools and colleges

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

sexual behaviours traffic light tool (Brook)

<https://www.brook.org.uk/education/sexual-behaviours-traffic-light-tool/>

sexting

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>

teenage relationship abuse

<https://www.gov.uk/government/collections/this-is-abuse-campaign>



3. Equality Statement

Some children have an increased risk of abuse, neglect or exploitation, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. Several factors may contribute to this increased vulnerability including societal attitudes and assumptions including prejudice and discrimination. Child protection procedures that are inadequately responsive to the diverse situations of children could be; isolation; social exclusion; communication issues; a child's personality, behaviour, disability and family circumstances and the reluctance on the part of some adults to accept that abuse, neglect and exploitation can occur.

The Greenhouse ensures that all our children receive equal protection recognising that our children are particularly vulnerable as they are/have:

- Disabilities or special educational needs
- Experienced domestic abuse and violence
- Lived in chaotic and unsupportive home environments
- Been affected by parental substance misuse
- Been taken into care and are or have been looked after by the Local Authority
- Experienced bullying or have engaged in bullying behaviours
- Lived in temporary accommodation
- Experienced discrimination and maltreatment on the grounds of race, ethnicity, religion, gender, disability or sexuality
- Been a young carer
- Been involved in child sexual exploitation
- At risk of becoming radicalised or violent extremism
- At risk of being involved in gangs
- At risk of forced marriage
- Do not have English as a first language

This list is not exhaustive and provides examples of additionally vulnerable groups.

Particular vigilance will be given to children who are subject to a child protection plan. Any incidents or concerns involving these children will be reported immediately to the child's social worker.

As an education provider where some young people have additional learning disabilities or cognitive impairments, there are a wide range of additional considerations and arrangements we make to support positive safeguarding and child protection.

We pay full attention to the DfE practical guidance - **Safeguarding Disabled Children – Practice and Guidance** <https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance>



The table below outlines a range of the considerations we make for the children and young people we work with and their broad range of needs:

Additional Need/Barrier/Concern	How this is addressed by the school
<p>Communication and Dependence Students who are non-verbal or find it difficult to communicate their needs, feelings, to explain what is happening in their life.</p>	<p>The Greenhouse has skilled staff that are able to communicate with young people in a broad range of methods.</p> <p>We have SEN/child friendly messages and lessons on safeguarding.</p> <p>Children are in classes where staff form strong bonds and understanding with children with communication difficulties, and are able to ‘tune-in’ to their needs, emotions and wishes through the intensive social and communication work they do.</p>
<p>Contextual/ Demographic/ and developmental levels.</p> <p>Students not understanding what may be going on in their environment. Students developmentally unable to understanding right, wrong, what is happening to them or others around them. Students witnessing abuse or criminal activity and not able to say or do not understand.</p>	<p>Students are supported by well trained, empathetic and supportive teams of staff.</p> <p>Staff are able to help communication, and through strong relationships are able to identify where there may be concerns. Staff are also trained to understand the changes in behavioural patterns may signify distress or issues.</p> <p>Due to specific needs of our students, information sharing is crucial to ensure that personal information about the individuals communication and behaviours are shared to make sure staff are able to spot signs of communication/ behaviour that may tell us something about what is happening in the individual's life.</p>
<p>Information sharing with all agencies must be consistent and regular, sharing past and present information to ensure no gaps in records - missing pieces of a puzzle</p>	<p>We have an effective Safeguarding Team and this supports our pastoral system in school in making sure information sharing and communication is well-organised and thorough at every level.</p>



<p>Students who self-harm, display challenging behaviours may appear with more physical markings resulting in questioning - difficult to identify if this is result of behaviour or mis-handling/abuse</p>	<p>Accurate record keeping is important to document all behaviours that lead to possible markings. Just as important is keeping accurate behaviour plans. Nevertheless, a marking on a self-harmer is investigated in the same way as those for whom it is not a common occurrence.</p>
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We provide pastoral support and attention for all our students, along with ensuring any appropriate support for communication is in place. Further guidance can be found from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND www.councilfordisabledchildren.org.uk
- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

The following link contains a range of professional information linked to Safeguarding those with additional needs.

<https://learning.nspcc.org.uk/safeguarding-child-protection/deaf-and-disabled-children#heading-top>

Children who are lesbian, gay, bisexual, or gender questioning

N.B. This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should



ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

4. Extremism and radicalisation

Protecting children from the risk of radicalisation is similar in nature to protection children from other harms including drugs, neglect, sexual exploitation and gangs. The Greenhouse is committed to building children's resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views.

Extremism is the support or promotion of an ideology based on violence, hatred or intolerance that aims to: deny or destroy the fundamental rights and freedoms of others.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate.

The Greenhouse acknowledges its duty under section 26 of the Counter-Terrorism and Security Act 2015 to have 'due regard to the need to prevent people from being drawn into terrorism'. This duty is known as the Prevent duty. At The Greenhouse we meet this duty by:

- Teaching a broad and balanced curriculum which promotes the spiritual, moral, cultural, social, mental and physical development of children and prepares them for the opportunities, responsibilities and experiences of life.
- Assessing the risk of children being drawn into terrorism. This is based on an understanding of the potential risk in the local area and is shared with partners.
- Protecting children from being drawn into terrorism by having robust safeguarding policies in place to identify children at risk and intervene as



appropriate. The Greenhouse staff will consider the level of risk and will identify the most appropriate referral including, for example, Channel.

- Set out clear procedures for ensuring that any visiting speakers, invited by staff or the children, are suitable and supervised appropriately.
- Ensure the safeguarding arrangements at The Greenhouse take into account the policies and procedures of the Local Safeguarding Children Board (LSCB) or Safeguarding Partnership.
- Arrange staff training that gives individuals the knowledge and confidence to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Through training staff will also know where and how to refer children and young people for further help.
- Ensure that children are safe from terrorist and extremist material when accessing the internet at The Greenhouse.

The Greenhouse will not tolerate the promotion of extremist religious views and partisan political views of any individual staff member or in the teaching of any subject in school. All members of staff must offer a balanced view and opinion to children while they are in attendance at our educational settings and while taking part in extra-curricular activities that are provided or organised by or on behalf of The Greenhouse.

For further information on **Prevent duty guidance**, refer to:

HM Government (July 2015) *Revised Prevent Duty Guidance: for England and Wales (Update April 2021)*

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Department for Education (2022) *The Prevent duty: Safeguarding learners vulnerable to radicalisation*

<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation>

5. Roles and Responsibilities

All members of staff (including agency and bank staff) have a responsibility to be aware of the procedures to be followed if they are worried a child or child is being abused.

5.1 Duty to Refer

It is the duty of all staff to immediately refer any child protection concerns about a child to Fiona Conde (Designated Safeguarding Lead) as soon as possible. In the absence of the Designated Safeguarding Lead, to avoid any unnecessary delays in responding to a child or a young person's needs, the Managing Director and Director of Education can also be consulted.

If as a member of staff, you are not satisfied with the Designated Safeguarding Lead's response, e.g. where they decide not to make a referral to Children's Social Care or you are unwilling or unable to make a report to them for whatever reason, you should make a referral yourself to Cheshire West and Chester Safeguarding Partnership:



Cheshire West and Chester Safeguarding Partnership

<https://cheshirewestscp.uk/>

If you have concerns about a child's welfare, or feel that they may be being abused or neglected, please call the Integrated Access and Referral Team (I-ART) or the Emergency Duty Team (EDT) for help and advice.

Office hours: [0300 123 7047](tel:03001237047)

- 8.30am – 5pm (Monday – Thursday)
- 8.30am – 4.30pm (Friday)

EDT Out of hours: [01244 977 277](tel:01244977277)

- 4.30pm – 8.30am (Monday – Thursday)
- From 4pm (Friday)
- 24 hours weekends and bank holidays

or Cheshire Police: 101 (999 in an emergency)

Please be assured that your referral will be treated in the strictest confidence. Remember, your call could mean the start of getting the right help to a family and may even save a child's life. For more information about reporting a concern please visit the Cheshire West and Chester Council webpages:

- [Making a referral](#)
- [Making enquiries into allegations of abuse or neglect](#)
- [Together we can tackle child abuse](#)

You can also speak to:

Protecting Vulnerable People (West Mercia Police): 0300 333 3000

NSPCC: 0800 800 5000

Childline: 0800 1111

If a child is in immediate danger, call the emergency services on 999.

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the safeguarding team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include *Channel*, the government's programme for identifying and supporting vulnerable individuals at risk of being drawn into terrorism, or the local authority children's social care team.



The Department for Education also has a dedicated telephone helpline, 0370 000 2288, which staff can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

If you have a mental health concern

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action. If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

We are currently aware that negative experiences and distressing life events associated to Covid 19 can affect the mental health of students and their parents/carers, we are well prepared to provide the right help at the right time.

Refer to the Department for Education guidance on mental health and behaviour in schools for more information: <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools—2>

5.2 Recognising and responding to concerns

It is important to remember that children rarely talk about their own abuse, for many reasons, and staff need to be vigilant to physical, emotional, sexual, and behavioural signs which may suggest abuse. If a child chooses to confide in you, disclosing any form of abuse, **the most important thing to do is to listen attentively without asking any leading questions, otherwise later investigation can be compromised.** The child must tell their own story in their own time. Even what seems to be an unbelievable story must be listened to and acted upon. If you make any notes, you must only use the child's own actual words, or the words in which anyone else reports to you. **You must not interrogate anyone or conduct your own investigation or make assumptions based on hearsay.**

See Appendix 1 - RESPONDING TO A CONCERN – THE “6 R’s RESPONSE”



5.3 Recording of disclosures/concerns

If note-taking is inappropriate, or not possible at the time, the member of staff involved should immediately afterwards note any key points using the child's own words and phrases, if possible, the record sheet should be **marked 'Child Protection – Strictly Confidential'**. **These notes must be kept as originals, timed, dated and signed, as they could be used as evidence in court.** As soon as possible the member of staff must seek out a Designated Safeguarding Person. **Disclosed information from a child cannot be discussed with any member of staff, other than a Designated Person.** The DSL will ask the member of staff to record their concerns formally using The Greenhouse recording template – see *appendix 3*. Following consideration, the Designated Person may decide to make a referral to the Local Safeguarding Children's Board (LSCB) or Safeguarding Partnership.

5.4 Physical Evidence

If any physical injuries or bruising are noticed it is appropriate, as a caring adult, to ask the child how they sustained the bruise, graze scratch, bite or other mark on their body. All such marks or injuries, however caused, must be recorded on as a body map diagram (see *appendix 3*) and handed to the Designated Safeguarding Person, with the child's explanation attached. The child must not be examined beneath their clothing. Further investigations must not be conducted, and the child should not be asked any leading questions.

5.5 Issues of Confidentiality

If a child requests confidentiality, they must be told that this cannot be promised, and it should be explained that staff have a responsibility to share information with those adults who will be able to help protect them from harm. The child should be reassured that only staff who need to know about it will be told. This could result in the child not continuing the conversation, in which case your enquiries should not be pursued but concerns recorded on the record sheet and handed to the Designated Safeguarding Lead. Staff should take care not to discuss information given in confidence outside the appropriate professional contexts. All documentation regarding the disclosure should be treated with the strictest of confidence and should only be shared with others on a need-to-know basis.

It is important that Directors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

- The Data Protection Act (DPA) 2018 and GDPR do not and should not prevent, or limit, the sharing of information for the purposes 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



- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who must make decisions about sharing information

5.6 Staff Concerns about Practice

If staff have any concerns about practices at The Greenhouse which they feel may put children at risk of abuse or serious harm they should raise these first with the Designated Safeguarding Lead. If they are not satisfied with the way in which The Greenhouse is dealing with the situation they can speak directly to Cheshire West and Chester Safeguarding Team:

To report concerns or for immediate help (out of hours):

- **Daytime (General Concerns):** Contact the main Children's Services team via the [Cheshire West and Chester Council website](#).
- **Emergency Duty Team (EDT):** Call 0300 123 5022 (evenings, weekends, bank holidays) or email EDT2@cheshirewestandchester.gov.uk (not for daytime use).

For more information, please refer to the Complaint, Suggestions and Feedback policy.

5.7 Making a Referral

When a Designated Safeguarding Person has been informed of a case of suspected abuse, neglect or exploitation or of a child who may be at risk of abuse, neglect or exploitation they must decide whether or not to make a referral to Children's Social Care. Children's Social Care can be contacted for support in relation to this decision making, either using anonymised information or passing on identifying details of a case. Referrals should be made to Cheshire West and Chester Safeguarding Team:

To report concerns or for immediate help (out of hours):

- **Daytime (General Concerns):** Contact the main Children's Services team via the [Cheshire West and Chester Council website](#).
- **Emergency Duty Team (EDT):** Call 0300 123 5022 (evenings, weekends, bank holidays) or email EDT2@cheshirewestandchester.gov.uk (not for daytime use).

All referrals should be made or confirmed using the appropriate pro-forma.

All referrals to the Local Safeguarding Children's Board/Safeguarding Partnership should be screened / evaluated by that agency within 1 working day and a decision made regarding the next course of action. Where there is to be no further action, feedback should be provided to the Designated Safeguarding Lead about the decision and the reasons for making it in writing within 48 hours.

Where appropriate, the Designated Safeguarding Lead will always bring relevant issues to the notice of the parents/carers, referring authority and children's social care in the child's home area.



5.8 Working with Parents and Carers

Designated Safeguarding Persons and other professionals should aim to work in partnership with parents/carers by attempting to discuss any concerns they have with them where possible. Permission should be sought by the Designated Safeguarding Lead from the person holding parental responsibility for the child before discussing a referral about them with other agencies, unless this process may in itself place a child at risk of significant harm or prejudice a criminal investigation.

Social care advice may be sought on the issue, as appropriate.

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 a looked after child's 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, the DSL will:

- Work closely with teachers 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.

Students with a social worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

The virtual school head for each young person includes a non-statutory responsibility for oversight of the attendance, attainment and progress of all our young people and will work closely with The Greenhouse and other professionals to improve outcomes.



In accordance with the School Attendance Regulations 2024, a school must make a return to the local authority when a pupil's name is deleted from the admission register.

Contextual Safeguarding

The DSL will have due regard to safeguarding incidents and/or behaviours that can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the designated safeguarding leads should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so our school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse, neglect or exploitation.

Additional information regarding contextual safeguarding is available here;
<https://learning.nspcc.org.uk/news/2019/october/what-is-contextual-safeguarding>

5.9 Support for Young People following a Referral

The child can choose an adult to accompany him or her, if he or she so wishes, to any interview, which may take place as a result of a Child Protection assessment, to offer support. However, the wishes and feelings of the child should be respected should they want to be on their own. If a child requires support from staff this will normally be granted in discussion with the Designated Safeguarding Lead. Interviews with children are undertaken by social workers and specially trained police, and these can be undertaken at The Greenhouse, or at an agreed location or at a special video interview suite, whichever is appropriate.

5.10 Multi-Agency Partnership

As an education provision we work in partnership with Children's Social Care in both our locality and young people's home areas. Any conflicts between locally agreed procedures and those of other placing authorities will be discussed and resolved, as appropriate.

In accordance with local procedures, we are required to liaise with Cheshire West and Chester Safeguarding Partnership, in all cases of abuse, neglect or exploitation or suspected abuse, neglect or exploitation which have arisen on site. This multi-agency approach enhances the effectiveness of identifying and dealing with child abuse issues that may arise.

The 'Safeguarding Partners' are defined as having 'joint and equal responsibility for local safeguarding arrangements'. There are three designated statutory safeguarding partners who are responsible for the Multi-Agency Safeguarding Arrangements in Cheshire West and Chester. They consist of:

1. The Chief Executive of Cheshire West and Chester Council
2. The Accountable Officer of Cheshire and Merseyside NHS Integrated Care Board
3. The Chief Constable of Cheshire Police.



6. General Strategies

6.1 Regulating and Vetting Visitors

All visitors to The Greenhouse must sign in on arrival at Reception and sign out on departure and always wear a visitors' badge. Arrangements for visiting young people are agreed in advance by the Head teacher in consultation with the placing authority and parents/carers, as appropriate.

All staff are responsible for ensuring that visitors are carefully monitored, in a manner appropriate to the individual circumstances. Under no circumstances, should any visitors ever have unsupervised access to the children. All Staff are expected to challenge anyone on the site if they are unsure of their identity, or do not display a visitor's badge.

6.2 Vetting of Staff & Safer Recruitment

There is always careful selection and vetting of all staff to prevent children from being exposed to potential abusers and nobody commences work unless all checks have been completed. Recruitment of all staff who work with young people at The Greenhouse, is in line with 'Safer Recruitment' guidelines. At least one person on every interview panel must have completed 'Safer Recruitment' training.

'Safer Recruitment' guidance includes checks on staff suitability with the Disclosure and Barring Service (DBS) (formerly Criminal Records Bureau). These checks are carried out on every member of staff and a record to verify the authenticity of identity, qualifications, and satisfactory DBS check is held centrally for each staff member.

Alongside of these checks there are robust interview processes, checks for gaps in employment and reference checks. Where agency staff are employed, The Greenhouse will seek written confirmation from the relevant agency that all appropriate checks have been carried out and are satisfactory. All agency staff are subject to appropriate identity checks on their arrival.

The relevant checks which are completed before commencement of any new staff member are:

- an identity check
- a barred list check
- an enhanced DBS check
- a prohibition from teaching check (NB This is not the same as a barred list check)
- a prohibition check must be made for anyone undertaking 'teaching work' (with or without Qualified Teacher Status)
- further checks on people living or working outside UK, including any restrictions placed on teachers from the European Economic Area (EEA*); (*EEA is all countries, plus Iceland, Liechtenstein, and Norway)
- a check of professional qualifications
- sufficient, appropriate and verified references from previous employers that involved working with young people
- a check to establish the person's right to work in the United Kingdom



- a section 128 prohibition check for people in management positions

All these checks will be entered into the SCR and evidenced by the person making the checks.

All staff members also receive induction training to include appropriate child protection training which is regularly updated.

For more information, please refer to the Safer Recruitment policy.

6.3 Induction of Staff

All new employees are given a Staff handbook which details policies and procedures they need to be aware of prior to working with our young people. This includes access to a copy of The Greenhouse 'Safeguarding and Child Protection Policy' and online training that must be completed within their first week.

6.4 Personal, Social, Health Education, and Preventative Education

Staff work hard to establish positive and trusting relationships with children in order for them to seek help when they are worried or have concerns about their own or others' safety. Issues surrounding social awareness, health education and sex education are taught to all young people during PSHE, Moving on and life skills lessons.

6.5 Children's Rights

We recognise that children are our primary concern and must be given a voice in matters relating to their education. Children's opinions are sought over key decisions which are likely to affect them. Children are informed of how to complain if they are unhappy with any aspect of their education, so that they can feel confident that any complaint will be addressed seriously and without delay. Complaints are reviewed at least once a month by the Headteacher, and issues raised are addressed. It is understood that being subjected to harassment, violence and or abuse, may breach children's rights, as set out in the Human Rights Act.

6.6 Anti-Bullying Policy

The Greenhouse has, and follows, an anti-bullying policy, with which young people and staff are familiar. Children who are bullied are supported, and those who may bully others are also subject to a risk assessment. Each child will have a plan outlining actions to address and support issues identified. The Greenhouse recognises the fact that bullying is the form of abuse most children fear. The Headteacher views records of bullying incidents at least once a month in order to take action where feasible to reduce or counteract the risk of bullying.

6.7 Attendance

The Greenhouse has a rigorous approach to monitoring absences quickly with appropriate follow-up to ensure that children's attendance in education is maintained. It is always important to try to establish why a child is absent in order to identify and address any potential difficulties the child may be experiencing. If abuse, neglect or



exploitation is cited, this should be referred to the Designated Safeguarding Lead in accordance with our Safeguarding and Child Protection Policy.

For more information, please refer to the Admissions and Attendance policy.

6.8 Use of Mobile Phones and other Multi-Media Devices

Given the potential for misuse, The Greenhouse provides comprehensive guidance for staff and children on the use of mobile phones, laptops and other multi-media devices. This guidance includes policies, training, specific lessons and discussions regarding safety responsibilities.

6.9 Internet Use and Multi-Media Policy

The Greenhouse has a written policy on the acceptable use of its internet and email facilities, which is made clear to staff, children, parents/carers and referring authorities. All staff are aware of, and follow in practice, the school's policy to protect staff and children from harm via the world wide web.

Directors will regularly review the effectiveness of filters and monitoring systems with the IT department to ensure that relevant staff are:

- aware of and understand the systems in place
- manage them effectively
- know how to escalate concerns when identified.

As a service, we will continue to communicate and monitor the importance of young people being safe online. We will share information with relevant professionals about:

- what systems are in place to filter and monitor online use
- what we are asking young people to do online, including the sites they will be asked to access
- who (if anyone) their young person is going to be interacting with online.
- discuss individual risk assessments, supervision arrangements and informative education about online safety involving our young people.

As an education provision, we will also block harmful and inappropriate content without unreasonably impacting teaching and learning.

6.10 Support

Child: To ensure that young people know who to approach at The Greenhouse if they have any worries about keeping themselves safe, the numbers for Childline, NSPCC Child Protection Helpline and Cheshire West and Chester Safeguarding Partnership are on display within our education provision.

Staff: All staff have individual support and development meetings with a member of senior staff. Children's Social Care may offer support to the Designated Safeguarding Lead and other Designated Safeguarding Persons who could be involved in a child protection investigation.



Parents/Carers: Can request to see the Safeguarding and Child Protection Policy if they would like to find out more information about our procedures. Children's Social Care advise us about giving appropriate support to families who may be involved in a child protection investigation or protection plan.

Equality legislation

The significance of the Equality Act 2010 to school safeguarding is important, including that schools and colleges:

- must not unlawfully discriminate against students because of their protected characteristics
- must consider how they are supporting students with protected characteristics
- must take positive action, where proportionate, to deal with the disadvantages these students face. For example, by making reasonable adjustments for disabled children and supporting the additional barriers faced by those young people who are gay, bi or trans (LGBT).

This includes a need to be conscious that pupils with protected characteristics may be more at risk of harm and integrate this into safeguarding policies and procedures. It is important to ensure young people have a safe space to speak out or share their concerns with members of staff.

6.11 Safeguarding Committee

The Greenhouse has a Safeguarding Committee, the members of the committee are communicated to all staff as well as details being displayed within the education provision.

The Safeguarding Committee consists of the following individuals:

Fiona Conde Headteacher and DSL

Tara Jones: Director of Education and Deputy DSL

The role of the Safeguarding Committee is to:

- Review, on an annual basis, the arrangements for safeguarding and promoting the welfare of children, and supporting the implementation of any action plan arising from that review;
- Meet on a monthly basis as part of the management meeting, or more often if required, in order to ensure the welfare of children;
- Oversee and monitor all safeguarding concerns;

In addition, the Managing Director (Jon Simpson) must be informed of all safeguarding concerns made to the Designated Safeguarding Lead, as soon as reasonably possible, and in any event within 24 hours of the concern being reported.

6.12 Staff Training

The Greenhouse operates best practice with regard to safer recruitment. The Chair of every appointment panel must have successfully completed safer recruitment training.



All Designated Safeguarding Leads (and Deputy Safeguarding Leads) are required to undertake multi-agency safeguarding training and will attend refresher courses every two years.

All staff are required to complete Safeguarding and Prevent awareness training as part of their induction. This is refreshed annually for education staff. Advanced training is made available to those with specific roles e.g. DSL's.

7. Concerns involving a member of staff

7.1. Reporting concerns

Any concerns that involve allegations against a member of staff (including a supply teacher or volunteer) should be referred immediately to the Designated Safeguarding Lead, who will make a decision whether or not to contact the Local Authority Designated Officer (LADO) for Cheshire West and Chester, to discuss and agree further action to be taken in respect of an allegation.

Whistleblowing is a procedure of reporting colleagues, a member of staff believes are doing something wrong or illegal, or who are neglecting their duties.

<https://www.gov.uk/whistleblowing>

For more information, please refer to the Whistleblowing policy.

Reporting to the LADO at Social Services in Cheshire West and Chester

The Local Authority Designated Officer (LADO) is the person to be notified when it has been alleged that a professional or volunteer who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

[LADO Process \(September 2025\) PDF 213KB](#)

Please note that there is no direct telephone number for the LADO as we operate a duty LADO rota. To make a referral you must complete the referral form below and on receipt the LADO will contact the person completing the form

[Allegations-Referral-Form-LADO \(updated April\) 25](#) Please complete and submit the referral to the secure LADO mailbox safeguardinglado@cheshirewestandchester.gov.uk

This must be completed by the senior manager (or other designated person who provides the information) of the employing agency for the adult concerned.

For more information see Appendix 4: Cheshire West and Chester LADO Procedure: A guide to managing allegations against an adult who works with children.



In the event of the allegation being directly or indirectly made about the Directors or Head teacher, the staff member should promptly report the allegation to the LADO at Social Services in Cheshire West and Chester and/or to the Police.

Allegations and complaints against staff are minimised by The Greenhouse by having:

- Safer Recruitment strategies in place Appropriate induction and training
- Open and transparent safeguarding ethos
- Professional code of conduct as set out in Staff Handbook
- Regular briefing and discussion of safeguarding issues
- Ensuring that all young people are aware of safeguarding issues through the curriculum, e.g. covering the topics of the new curriculum for Relationships and Sex Education and also Online safety etc.

7.2 Support for staff subject to allegations

The Designated Safeguarding Lead will inform any member of staff who is subject to an allegation about that allegation as soon as possible. However, the Designated Safeguarding Lead will have to follow directions from Children's Social Care and/or the police as to what can be shared and when.

It is recognised that any allegation of abuse will cause the member of staff anxiety and advice will be given as to possible avenues of support from, for example, their union, professional association or the Leadership Team. The staff member will be kept advised as to the progress of the investigation as far as possible.

Please refer to guidance "Allegations of Abuse against Teachers and other staff (2012) and Part Four of Keeping Children Safe in Education (2025)

Low level concerns

The headteacher / DSL should ultimately be informed of all low-level concerns and make the final decision on how to respond. Low level concerns which are shared about supply staff and contractors should also be notified to their employers; and schools and colleges should consult with their LADO if unsure whether low-level concerns shared about a member of staff meet the harm threshold.

For more information, please refer to the Complaint, Suggestions and Feedback policy.

8. General Guidance to Staff

8.1 Working with Children

Staff must be aware of the potential problems associated with making physical contact with children, especially with children of the opposite sex. Contact must always be appropriate to the relationship of a professional with a client. Many of our children may have been damaged by inappropriate contact and they may be very sensitive or unable to process personal contact appropriately. As a staff team we should always be alert and ready to advise our colleagues, if anything might be seen as improper. There may be times when it is appropriate for staff to spend one to one time with a child, for example during 1:1 tutoring sessions. Staff should always ensure that proper safeguards are in



place for the protection of both themselves and the child, e.g. making sure that other staff are aware of the teaching session/meeting and will occasionally check that everything is okay. Regard should always be given to the potential additional problems of teaching or caring for children of the opposite sex. Advice should be taken from senior staff regarding what is acceptable or unacceptable risk-taking in this area.

8.2 Giving and Receiving Gifts

The Greenhouse accepts that the giving of gifts and presents by staff to children will at times be quite appropriate, e.g. teaching staff giving children rewards for positive behaviour or good work. To safeguard all involved, all gifts given are to be given open and publicly, e.g. awards celebrations, during a birthday meal etc. Monitoring of gifts given takes place on a regular basis by senior staff. The receiving of small gifts by staff from children is viewed and treated in the same way.

8.3 Film Classifications and Computer Games

When showing films for young people in school, staff should satisfy themselves that the classification of the film, e.g. 'U', 'PG', '12a', '12' or '15' is appropriate for the age of the young people, even if only one child is in the "wrong" category. Under no circumstances are young people allowed to watch a film where the age classification is above the individual's age. The above conditions also apply to Computer Games.

8.4 Safe Working Practice

All Greenhouse staff should take normal precautions not to place themselves in a vulnerable position in relation to child protection. Failure to report actual or reasonably suspected physical, sexual or emotional abuse or neglect of a child is a disciplinary offence.

9. Storage, transfer and retention of child protection records

The Greenhouse follow the principles of record keeping contained within the Data Protection Act 1988, the Human Rights Act 1998 and the Freedom of Information Act 2005 and Information Sharing: Advice for practitioners providing safeguarding services (2015).

9.1 Storage of child protection records

All child protection records are kept and stored securely on SharePoint in the Safeguarding folder. Only the DSL, Deputy DSL and Managing Director have access to this folder. A paper copy of all files is also kept in a locked cupboard in the Headteacher's office.

9.2 Transfer of child protection records

When a young person transfers to another school or college, their original child protection records (if any) must be forwarded to the new provision without delay, and in any case within five working days. Care must be taken to ensure confidentiality is always maintained and the transfer process is as safe as possible. This is the responsibility of the DSL. If the records are posted, they should be copied and these copies retained until there has been confirmation that the originals have arrived. Confirmation **in writing** is



required from the new education provision to confirm receipt of a student's child protection records whether they are posted, hand delivered or sent electronically. This receipt should be retained for no less than six years.

9.3 Retention of child protection records

The Greenhouse will retain the child protection records of any young person for as long as they will remain on roll and transfer them in accordance with the process outlined above, where appropriate. If The Greenhouse is the last education setting the young person attends, then the records are kept until the young person has their 26th birthday and then securely disposed of.



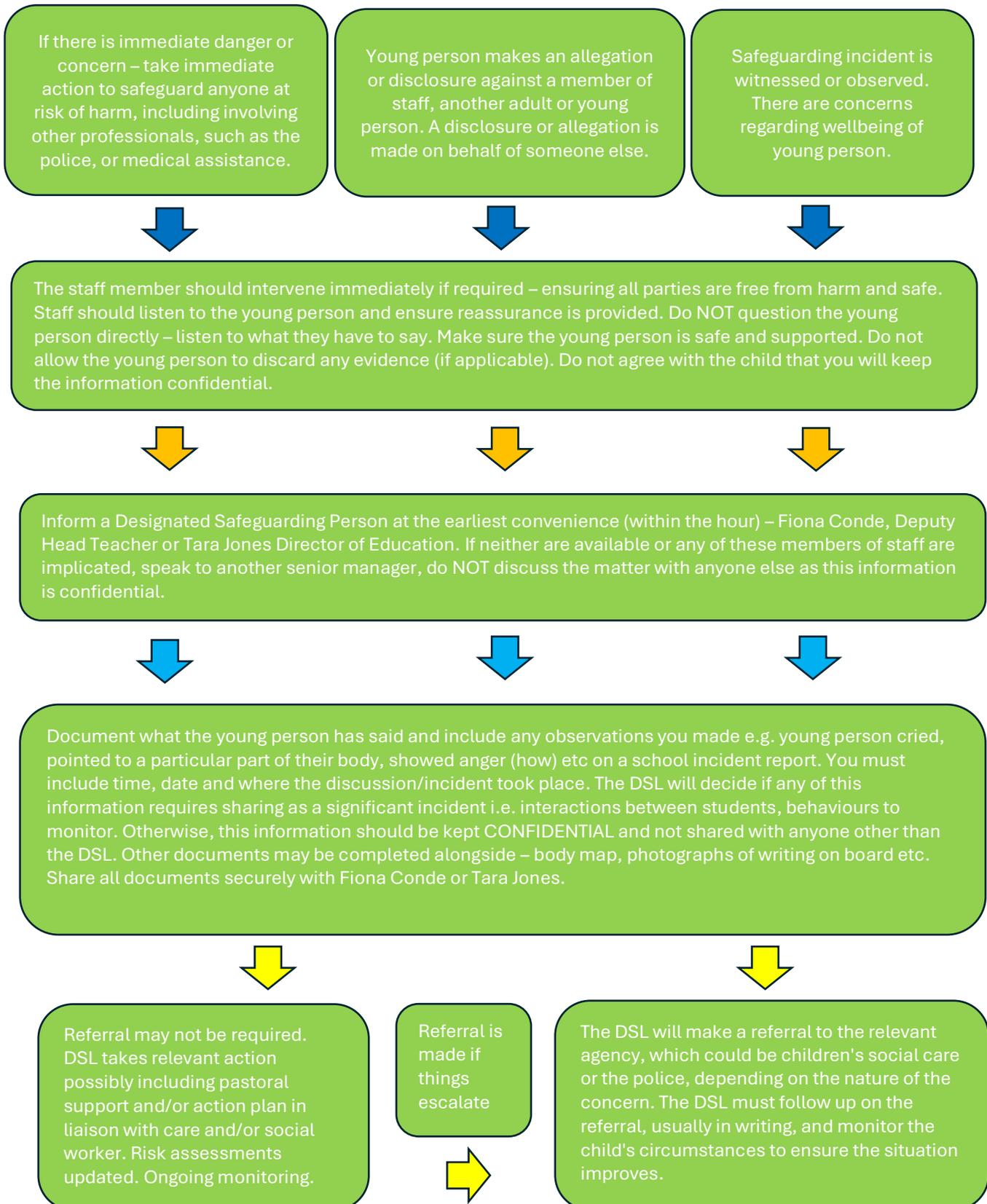
Appendix 1 - RESPONDING TO A CONCERN – THE “6 R’s RESPONSE”

RECEIVE
<ul style="list-style-type: none"> <input type="checkbox"/> If a child wants to talk to you, never ask them to come back later. Ask them what they want to talk to you about and, if you are concerned about their welfare, give them the time to speak to you. <input type="checkbox"/> Never promise confidentiality, inform the child that you are happy to talk to them but if they tell you anything that you believe may be putting them at harm that you will have to talk to someone. <input type="checkbox"/> Listen carefully to the child. Do not stop a child who is freely recalling information. <input type="checkbox"/> Where a child is visibly upset or has an obvious injury, it is good practice to ask a child why they are upset or how an injury was caused, or respond to a child wanting to talk to you to help clarify vague concerns and result in the right action being taken.
REASSURE
<ul style="list-style-type: none"> <input type="checkbox"/> Ensure that the child is aware that they have done the right thing in talking to you and that they have not done anything wrong. <input type="checkbox"/> If you have any concerns that the child has been, or is at risk of harm, you must tell them that you will speak to someone to get help.
REACT
<ul style="list-style-type: none"> <input type="checkbox"/> If you need to clarify information ask open-ended questions e.g. <i>“Is there anything you'd like to tell me?”</i>, <i>“Can you explain to me...”</i>, <i>“Can you describe to me...”</i> <input type="checkbox"/> Never ask leading or suggestive questions e.g. <i>‘Did he/she do anything that they shouldn't have done?’</i> <input type="checkbox"/> Never ask 'accusing' questions e.g. <i>“Why didn't you tell someone earlier?”</i> <input type="checkbox"/> Never criticise the alleged perpetrator, it may be someone that they will continue to live with. Never ask the student to repeat their disclosure for any other member of staff, it is your responsibility to share the information <input type="checkbox"/> These four factors may compromise enquiries that need to be made later by children’s social care or Police.
RECORD
<ul style="list-style-type: none"> <input type="checkbox"/> Make notes as soon as possible afterwards using the words that the child has used. <input type="checkbox"/> Do not record your assumptions and interpretations, just what you heard and saw. <input type="checkbox"/> Do not destroy original notes even if you later write things up more neatly and fully. <input type="checkbox"/> Record the date, time and place of the disclosure. <input type="checkbox"/> Sign any written records and identify your position in the school setting. <input type="checkbox"/> Do not ask a child to write and account or sign any of your documentation as this may compromise enquiries that need to be made later by children’s social care or Police.
REFER
<ul style="list-style-type: none"> <input type="checkbox"/> Immediately inform the Designated Safeguarding Person for child protection (Natalie Dixon) or in their absence the Deputy Designated Safeguarding Person for child protection who will be responsible for following the appropriate procedures. In the absence of anyone being available in school, contact the Local Authority
REFLECT
<ul style="list-style-type: none"> <input type="checkbox"/> Ask yourself if you have done everything you can within your role. <input type="checkbox"/> Refer any remaining concerns to the designated teacher, e.g. any knowledge of siblings in the school, or previous contact with parents. <input type="checkbox"/> Dealing with disclosures can be difficult and disturbing; you should seek support for yourself via the support within your school or an alternative source but be aware of principles of confidentiality



Appendix 2 - Safeguarding Referral Flowchart

Staff member has concern → Report to DSL → DSL assesses and takes action → Refer to Children's Social Care or Police → Contact parents/carers if appropriate → Log all actions and decisions.



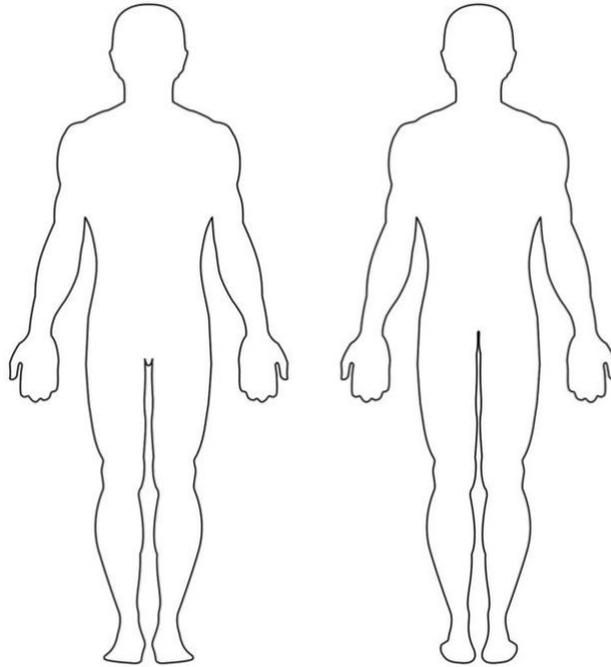


Appendix 3 - Safeguarding Concerns Record Form

Reporter Name and role:	
Student:	
Date:	
Time:	
Location:	
Details of significant incident/conversation/concern:	



Body Map (if appropriate):



Front

Back

Actions taken:

Follow up from DSL:



Appendix 4 – Cheshire West and Chester LADO Procedure: A guide to managing allegations against an adult who works with children.



Local Authority Designated Officer (LADO) Procedure

A guide to managing allegations against an adult who works with children.

If an allegation is made about an employee or a volunteer working with children/young people, or work in regulated activity with children it must be reported to the agency/organisations Designated Safeguarding Lead or Senior Manager. This applies to allegations/concerns raised about people in their personal as well as professional lives.



- Threshold/s for referral to LADO:**
- Behaved in a way that has harmed a child, or may have harmed a child
 - Possibly committed a criminal offence against or related to a child
 - Behaved towards a child or children in a way that indicates they pose a risk of harm to children
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children



Designated Safeguarding Lead or Manager completes the Allegations (LADO) Referral Form which can be found using the link below
[Allegations Management \(LADO\) - Cheshire West and Chester Safeguarding Children Partnership \(cheshirewestscp.co.uk\)](https://www.cheshirewestscp.co.uk), once completed email to SafeguardingLado@cheshirewestandchester.gov.uk



The LADO will measure against threshold and agree next steps with referral:



A LADO process is not needed



It is unclear if a LADO process is needed



A LADO Process is needed



Make recommendations regarding any further actions as required



Identify the further information needed, how this will be sought and confirm the need for a further discussion with the LADO to determine whether a LADO process is needed



If a LADO process is needed the LADO will:

- Consider immediate risks
- Refer to the Police
- Set a date for a LADO Allegation Management Meeting, should be convened within five working days of receiving the referral
- Recommend informing regulatory bodies

At the end of the process an outcome will be determined and shared





The LADO is responsible for co-ordinating and overseeing the response to an allegation made against staff or volunteers working with children. Most allegations will relate to behaviours at work, but concerns can also be about incidents in a person's home life or concerns about the care of their children.

LADO's key role is to:

- Determine if threshold is met with referrer
- Provide oversight and scrutiny of the process to minimise delay and impact on the adult and children involved, with a consistent and fair process
- Communicate as appropriate with key agencies and regulatory bodies
- Chairing LADO Allegation Management Meetings
- Facilitate a multi-agency decision making process to determine agreed outcome of the referral
- Reporting to the Safeguarding Children Partnership

The LADO does not:

- Undertake investigations
- Have direct communication with the adult subject of the allegation
- Have direct communication with the named child/ren
- Provide HR advice in respect of suspension or dismissal
- Make individual decisions in response to a referral

LADO Contact details

There is no direct telephone number for the LADO, we operate a duty LADO rota. To make a referral you must complete the referral form which can be found using the following link [Allegations-Referral-Form-LADO.docx](#).

Once completed email to SafeguardingLADO@cheshirewestandchester.gov.uk. Upon receipt the LADO will contact the referrer.

For more information on the Cheshire West and Chester Safeguarding Children Partnership, please visit www.cheshirewestscp.co.uk.



This policy has been checked & reviewed by Jonathon Simpson (Business Director).

Jonathon Simpson

Review Date: September 2025

Next Review Date: September 2026