Safeguarding Policy

Safeguarding Is Everyone's Responsibility (Lord Laming 2003)

This document contains confidential and proprietary information intended for the specified recipients.

The safeguarding of children is of utmost importance to all at Creative to ensure that we provide a secure and inclusive environment in which all students can flourish and grow.

Safeguarding inevitably involves uncertainty, ambiguity and fallibility due to the limited knowledge, predictions about the child's future welfare are imperfect, and there is no definitive way of balancing the conflicting rights of parents/carers and students. However, it is a fundamental principle that the protection of students from harm is the responsibility of all individuals working with students. Parents and the public rightly expect high standards from staff keeping students safe and identifying and responding to any safeguarding issues achieving this is challenging for practitioners working in this area of work however we must strive to meet these expectations.

Creative fully recognises the contribution it makes to child protection and safeguarding and moreover the aim is not just to minimise risks to students but to promote their health and welfare in doing so staff must be aware and vigilant to signs of concern. The terms 'child protection' and 'safeguarding' mean different things to different people and it is for this reason that the Welsh Government have defined the terms; the definitions may be viewed at *Appendix A.*

This policy is informed by and complies with the following legislation and guidance:

- Children Act 1989 & 2004
- All Wales Child Protection Procedures 2019
- Social Services and Well-being (Wales) Act 2014
- Keeping Learners Safe (Welsh Government Guidance 2022)
- Working Together to Safeguard People (Welsh Government 2022)
- Prevent Duty (Counter-Terrorism & Security Act 2015) (2023)
- Education and Training (Welfare of Children) Act 2021
- Estyn's Safeguarding Expectations
- Welsh Government's Belonging, Engaging, and Participating Guidance 290/2023

Statement of Compliance

Creative outlines compliance to safeguard and promote the well-being and health and safety of children who attend the school.

The independent school will adhere to the standards set out in The Independent Schools Standards (Wales) Regulations 2024, with particular reference to Part 3 of the standards set out below:

Part 3: The Independent Schools Standards (Wales) Regulations 2024

Welfare, Health and Safety of Pupils

1. The standards about welfare, health and safety of pupils at the independent school are those
2. Contained in this part:
3. The standard in this paragraph is met if the proprietor ensures that—
   (a) arrangements are made to safeguard and promote the welfare of pupils at the independent school,
   (b) a written policy to safeguard and promote the welfare of pupils is drawn up and effectively implemented, and
   (c) those arrangements and that policy have regard to any relevant guidance issued by the Welsh Ministers.

(Extract from the Regulations)

https://www.gov.wales/independent-schools-registration-and-operational-guidance-html

Safeguarding Personnel and Statutory Services Details

The two key directors will have daily overarching awareness from the school staffing group of any concerns or issues that may require action.

Designated Safeguarding Lead - Alison Matthias 07919811867

Deputy Safeguarding Lead - Darren Martin 07470818591

In their absence – Kelly Vaughan

Reporting Concerns about a Child – Individual Staff Responsibility

Contact Details of the Statutory Services in which the school currently has children attending from the below authorities. **All Referrals will be to the statutory services where the child is living.** This may include contact with police where necessary due to the concerns (which may involve criminal activity) which require immediate police involvement.

Notification of the referral will also be sent to the education safeguard lead in the authority where the student lives this forms part of the working partnership between the school and placing authority for the student.

Safeguarding Protocol – 2025

Student makes an admission/ allegation (if there are any others present, including other students, take the child somewhere private)



Phone Alison or Darren to make them aware of the incident. If they are unable to answer, phone a second time immediately afterwards. If they do not answer, phone Kelly



Detail any admission/ allegation made in an incident report in SharePoint under incident reports as soon as possible (must be during work day and before you leave. **Safeguarding takes priority**)



Email a copy of that report directly to Darren, Alison and Kelly as soon as possible (before end of work day)



Darren, Alison or Kelly will notify you of actions taken. Please add to incident report at earliest convenience

Children Services main contact details to access advice and support.

01824 712200 (Denbighshire)

01352 701000 (Flintshire)

01978 292039 (Wrexham)

Out of Hours Service EDT **for all the above authorities** after 5pm Mon – Thurs / Fri 4.30 pm.

EDT – 0345 053 3116

Early Help

Early help means providing support as soon as a problem emerges at any point in a child's life. The school recognises that children may benefit most from early intervention and has arrangements for listening to children and providing early help. All staff have received training (currently provided by a safeguarding trainer in person at the beginning of each year as well as regular staff updates led by the DSL lead) on the necessity to identify children who may benefit from early help, being aware of the early help process and understanding their role. Staff are still required to speak to a DSL as soon as possible to discuss ways in which a child can be supported and receive help.

Students with Additional Learning Needs (ALN)

Statistically, students with behavioural difficulties and disabilities are most vulnerable to abuse. Staff who deal with students with varying disabilities, sensory impairment and/or emotional and behaviour problems will be particularly sensitive to signs of abuse.

Staff need to have a high level of awareness with students who have ALN and promote a culture where students are able to make their wishes and feelings known in respect of their care and treatment.

Making sure all students with ALN know how to raise concerns if they are worried or angry about something and providing them access to a range of adults with whom they can communicate and feel comfortable with is vital if we are to ensure any concerns are known and expressed clearly for staff to act and report matters. Students with communication difficulties should have available to them at all times, a means of being heard.

Students with ALN who are interviewed as part of any safeguarding investigation should be allowed to express their views as to who will be the appropriate adult in an interview situation. Advice must be sought from Children's Service Gateway in relation to the appropriate involvement of family or school staff in the attendance of any interview with the child or young person.

Looked After Children

Creative will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on the school roll who are looked after by a local authority.

The designated member of staff, Kelly Vaughan, who has responsibility for their welfare and progress will manage the daily needs of the student whilst at the school. The key staff will receive appropriate training in order to carry out their role.

The school will liaise when necessary with the LAC Education Liaison Officers in the local authority Children Services or Education services to seek advice and support beyond the school scope of supporting LAC pupils.
Need to add the LAC officers for Flintshire / Denbighshire / Wrexham?
CLA Education Liaison Officer Contact No: 01824 – 712880 Denbighshire
CLA Education Officer Contact No : 01978 - 295400 Wrexham
CLA Education Officer Contact No : 01352 - 703919 Flintshire

Allegations Against Staff – Procedures

What staff should do if they have concerns about another staff member

If staff have concerns about another staff member, then this should be referred to a Designated Safeguarding Lead (DSL). Where there are concerns about a DSL, this should be referred to a Director of Creative. In the event of allegations of abuse being made against a staff member please refer to the procedures above regarding allegations of abuse against staff (including volunteers) and refer the matter directly to the designated safeguarding lead or Directors of Creative and make any necessary referral via these safeguarding staff.

Staff also need to be aware that matters that happen outside of the workplace can have an impact on their professional role and require reporting to their employer, referred and investigated where necessary by the statutory services.

What staff should do if they have concerns about safeguarding practices in the school

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these should be raised in accordance with the school's whistleblowing procedures which can be found in the school's Whistleblowing Policy. There will be no disciplinary action taken against a member of staff for making such a report, provided that it is done in good faith.

The member of staff or volunteer should bring their concerns to the attention of one of the Designated Safeguarding Leads, or in a case where the concerns relate to the actions or inaction of the Designated Safeguarding Leads, to one of the Directors of Creative.

Where a staff member feels unable to raise an issue through the school's channels, or feels that their genuine concerns are not being addressed, other whistleblowing channels (e.g. the Local Authority where the school is based can be contacted) to ensure matters are brought to the attention of services (Children Services) outside of Creative in Excellence and Pathways Learning. Contact details for Flintshire County Council can be found on the page above.

Description of Policy Formation and Consultation Process

The School Safeguarding Structure is as follows:

Directors	Strategic overview, overall leadership management and administration
All staff	Legal duty to record and report safeguarding concerns

There are three main elements to the policy with regards to the safeguarding of children:

- **Prevention** through the teaching and pastoral support offered to students.
- **Procedures** for identifying and reporting cases, or suspected cases, of abuse. Because of our day-to-day contact with students, staff are well placed to observe the outwards signs of abuse.
- **Support** to students who may have been abused or raised a safeguarding concern

This policy applies to all staff and volunteers working in Creative. Teachers, teaching assistants and office staff all of whom can be the first point of disclosure for a child.

All staff MUST record and report any safeguarding, concerns or suspicions to the Designated Safeguarding Person as soon as it is identified and practically possible and in any case, within 24 hours to Children and Family Services (To be found online)

Please Note:

This is not a matter of individual choice, but a duty placed upon staff to report their concerns

<u>Directors (Proprietors of Creative)</u>

- Ensure Creative has effective policies and procedures in place to deal with child protection and safeguarding matters.
- Ensure Creative follows safe recruitment processes and ensures appropriate employment checks.
- Ensure Creative has effective policies and procedures in place to deal with allegations of abuse against members of staff.
- Ensure that a site safeguarding risk assessment is completed annually in line with Health and Safety procedures.
- Monitor compliance with those policies and procedures.
- Ensure any deficiencies in relation to child protection arrangements are brought to its attention and remedied without delay.
- Ensure all staff and governors undertake the appropriate training.

- Review its policies and procedures annually.

- Ensure that a named designated safeguarding person is always on site or that appropriate arrangements of cover are in place to ensure any safeguarding/child protection issues are dealt with immediately.

- Ensure that the matter is referred on the day of the concern being raised or as soon as practically possible -and in any event, within 24 hours.

- Directors will have read and fully understood the Welsh Government Guidance: Circular No: Keeping Learners Safe 2022 – 009/2014 Handling allegations of abuse against teachers & other staff.

- Ensure every member of staff knows:
  - the name of the Designated Safeguarding Person and their role,
  - that they have individual responsible duty for referring any child protection or safeguarding concern to the Designated Safeguarding Person within the agreed timescales,
  - that they have individual responsibility to take forward concerns to the Deputy Designated Safeguarding Person if the Safeguarding Lead is unavailable,
  - that they have a duty to follow up concerns and make referrals if necessary.

- Ensure that members of staff are aware of the need to be alert to signs of abuse and know how to respond to a student who may tell you about such concerns and know how to respond to a student who may disclose abuse.

- Ensure that parents have an understanding of the responsibility placed on Creative and staff for child protection by setting out its obligations in the centre prospectus.

- Provide mandatory Level 1 Safeguarding training for all staff, as part of their induction and every following 2 years, so that they know:
  - their individual responsibility,
  - the agreed procedures,
  - the need to be aware and vigilant in identifying cases of abuse,
  - how to support the student who discloses or you become aware of a concern.

- Ensure that notification is sent to the authority / body who referred the student to Creative.

- Establish and maintain effective links with relevant agencies and schools as required, with particular focus on child protection matters, including attendance at initial review and case conferences, core groups and the submission of comprehensive written reports to the conferences.

- Ensure written records are kept of concern about a student (noting the date, event, persons present during discussions, action taken, the reasons any decisions were taken including, if the decision is not to report), even where there is no need to refer the matter to Children's Services immediately.

- Ensure all records are kept secure and in locked locations.

- Adhere to the procedure set out in the Welsh Government guidance circular when an allegation is made against a member of staff Welsh Government Circular: 009/2014 - (Handling allegations of abuse against teachers and other staff).

- Ensure that the recruitment and selection procedures are made in accordance with Welsh Government Circular: Keeping Learners Safe 2022 Chapter 5.

- Undertake the appropriate level and enhanced training required of the DSL role.

- Be on-site, or ensure that appropriate arrangements are in place in their absence, to ensure any safeguarding/child protection issues are dealt with by a trained and named Designated Safeguarding Person (Level 3 training every year).

- Refer the matter on the day of the concern being raised to them and in any event, within 24 hours. Where there is uncertainty advice is always available via Children and Family Services Gateway.

- Work closely with all staff to oversee the safeguarding policy and practice.

- Notify the Directors of any non-compliance with the procedure or further training requirements.

- Be alert to signs of abuse and know how to respond to a student who may tell of abuse and know how to respond to a student who may disclose abuse.

- The Designated Safeguarding Lead / Person will have read and fully understood the current Wales Safeguarding Procedures 2019 together with the Welsh Government Guidance: Circular No: 009/2014 Safeguarding Children in Education -Keeping Learners Safe Guidance 2022 and Handling Allegations of Abuse Against Teachers and other staff. They will also have completed appropriate Safeguarding Training commensurate with the role.

Roles and Responsibilities of Staff

All Staff and Volunteers

- **Awareness:** Maintain a thorough understanding of safeguarding policies and procedures.
- **Vigilance:** Recognise signs of abuse, neglect, or harm.
- **Action:** Promptly report any concerns to the DSL or Deputy DSL.
- **Training:** Participate in regular safeguarding training sessions to stay informed of current practices and legislative changes at local and national level.

Designated Safeguarding Lead (DSL)

- **Leadership:** Oversee the implementation and effectiveness of safeguarding policies.
- **Coordination:** Act as the primary liaison with external agencies, including local authorities and law enforcement.
- **Undertake** the safeguarding Audit yearly
- **Support:** Provide guidance and support to staff regarding safeguarding concerns.
- **Record-Keeping:** Ensure meticulous and confidential records of all safeguarding issues are maintained.

Senior Management and Governing Body

- **Oversight:** Ensure compliance with safeguarding legislation and guidance.
- **Aware** of the safeguarding audit completion and its school improvement plan
- **Ensure** training of staff is completed within timescales
- **Resources:** Allocate appropriate resources for effective safeguarding practices.
- **Policy Review:** Review each year and update safeguarding policies and procedures.

Parents and Guardians

- **Communication:** Inform the service of any concerns regarding their child's welfare.
- **Collaboration:** Engage in open dialogue with staff to support safeguarding measures.

Recognising and Responding to Concerns

Types of Abuse

Staff should be vigilant for indicators of:

- **Physical Abuse:** Infliction of physical harm.
- **Emotional Abuse:** Persistent emotional maltreatment.
- **Sexual Abuse:** Involvement in sexual activities without consent.
- **Neglect:** Failure to meet basic physical and psychological needs.

Reporting Procedures

- **Immediate Action:** Any suspicion or disclosure of abuse must be reported to the DSL without delay.
- **Documentation:** Record all concerns accurately, including dates, times, and detailed observations via Sharepoint
- **Confidentiality:** Handle all reports with strict confidentiality, sharing information only with relevant personnel and agencies.

Safer Recruitment

To ensure the safety of children, Creative implements rigorous recruitment processes:

- **Background Checks:** All prospective employees and volunteers undergo enhanced Disclosure and Barring Service (DBS) checks.
- **References:** Obtain and verify at least two professional references
- **Checks** on professional and vocational qualifications of prospective staff.
- **Interviews:** Conduct face-to-face interviews with a focus on safeguarding awareness.
- **Probation:** Implement a probationary period to assess suitability for the role.

Training and Development

Continuous professional development is vital for effective safeguarding:

- **Induction:** All new staff receive comprehensive safeguarding training upon joining.
- **Ongoing Training:** Regular updates and refresher courses are provided to ensure current knowledge of policies and procedures.
- **Specialised Training:** DSL and Deputy DSL receive advanced training to manage complex safeguarding issues.

Online Safety

In the digital age, protecting children online is paramount:

- **Secure Platforms:** Utilise encrypted and password-protected platforms for online interactions.
- **Guidelines:** Establish clear protocols for online communication between staff and students.
- **Education:** Teach children about online safety, including recognising and reporting inappropriate content or behaviour.
- **Monitoring:** Regularly review online activities and address any concerns promptly.

Mobile Phones

Pupils will be able to bring mobile phones with them as long as they do not interfere with their work.

What is AI and the Curriculum

AI describes technologies that can perform tasks which usually need human intelligence.

The school enables students to engage responsibly with Generative AI through its curriculum. School is aware students will need to develop opportunity to engage with AI literacy to thrive in the future to think critically and engage with evidence and information whilst maintaining a safe understanding of its potential and risks.

To support school teachers and support staff with the use of Generative AI new guidance has been published on the Welsh Government Hwb web-site. School has access to this leading support and input from on-line safety experts including :

Uk Safer Internet Centre

Common Sense Education

And Internet Matters

Code of Conduct for Staff and Tutors

Professionalism and integrity are expected at all times:

- **Boundaries:** Maintain appropriate relationships with students, avoiding any behaviour that could be misinterpreted.
- **Communication:** Use official channels for all communications, refraining from personal contact outside of professional duties.
- **Behaviour:** Exhibit exemplary conduct, serving as role models for students.
- **Reporting:** Disclose any personal relationships with students that could be perceived as a conflict of interest.

Prevent Duty and Radicalisation

In alignment with the Prevent Duty:

- **Awareness:** Recognise signs of radicalisation and understand the pathways to extremism.
- **Training:** Equip staff with the knowledge to identify and respond to radicalisation concerns.
- **Reporting:** Refer any concerns and referral to the statutory services using the normal referral route as above in Section 2 of the policy regarding any potential radicalisation to the DSL, who will liaise with appropriate authorities about actions to be taken or referral

Transport and Off-Site Activities

Ensuring safety beyond the classroom:

- **Transport Safety:** Verify that all transportation providers have appropriate licenses and insurance, and that vehicles are well-maintained.
- **Supervision:** Ensure adequate staff-to-student ratios during off-site activities.
- **Risk Assessments:** Conduct thorough risk assessments for all trips and activities.
- **Parental Consent:** Obtain written consent from parents or guardians for all off-site events.

Whistleblowing

A culture of transparency is encouraged:

- **Policy Awareness:** Ensure all staff are familiar with the whistleblowing policy.
- **Protection:** Guarantee protection for individuals who report concerns in good faith.
- **Procedures:** Provide clear steps for reporting malpractice or misconduct, ensuring concerns are addressed promptly and appropriately.

Record Keeping and Information Sharing – A Significant Part of Safeguarding

Accurate records are essential for effective safeguarding:

- **Documentation:** Maintain detailed records of all concerns, actions taken, and outcomes.
- **Confidentiality:** Store records securely, with access limited to authorized personnel.
- **Information Sharing:** Share information with external agencies when necessary, in line with legal and ethical guidelines

Appendices.

Appendix A-

Definitions

Safeguarding - Is to Prevent Harm to a Child

Child Protection – Where we respond to harm to a Child

Vulnerable Child – A child who are exposed to risk more than their Peers

Helpful guide when speaking to a child about a Concern:

Child's Comments

What did they actually say, quote their words, do not put asterisk instead of swear words or difficult words. Use actual words if you can remember or state that they were similar words used and that you are being approximate

Situation and Task

Where was the incident, what was the child supposed to be doing, was this usual task/situation for the child to be in, was this something that the child would not have experienced before. Were clear instructions given?

Others present

How many other children were present, were any involved, what was their contribution to the incident?

Environmental Factors

Was there anything about the child's physical surroundings that affected their behaviour?

Other adults present

Do you need to cross-reference your account of the incident with anyone else's?

Adult's comments

What words were actually spoken to the child at the end of the incident/event?

Written Record

Record the Time, Day and Place of the incident, any disclosure and the time that the notes were made. Recordings must be:

Timely	-As soon as possible and within the same working day and if a child protection concern or referral as soon as practicably possible.
Factual	-Do not record your opinion - imagine that you are a video camera watching the incident, and write a narrative that is descriptive but not over complicated.

Event/Incident conclusion

How did the matter end, what was the child's behaviour like at the end of and after the incident? Describe your follow up actions e.g. informed the Child Protection Officer and provide him/her with my notes of the incident. Where appropriate, provide a rationale for your decision.

Note: Not all items above will be relevant for all records, just be mindful of the headings and record information that is available, do not feel compelled to 'tick every box'

Appendix B

Estyn SER Self – Evaluation

Keeping Learners Safe Guidance 2022 Safeguarding Audit