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**Stepping Stones Alternative Provision**

**Safeguarding Policy**

**Date: 15th August 2024  
Review Date: August 2025**

This document is the overarching policy statement for Stepping Stones Alternative Provision. All individual schools and provisions have their own safeguarding policy which detail local procedures.

**Language:**

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of children’s health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best life chances.

Early Help refers to mechanisms providing support as soon as a problem emerges at any point in a child’s life, from the foundation years through to the teenage years.

Child Protection refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Staff refers to all those working for or on behalf of Stepping Stones Alternative Provision in either a paid or voluntary capacity and will be used from this point on in this document.

Child refers to all young people who have not yet reached the age of 18.

Student refers to the young people that have been enrolled at Stepping Stones.

Parent refers to birth parents and other adults who are in a parenting role including; step-parents, foster parents, carers, adoptive parents and guardians.

1. **Rationale:**

At Stepping Stones Alternative Provision we recognise the responsibility we have under Section 175 of the Education and Inspections Act 2002, to have arrangements for safeguarding and promoting the welfare of children. This policy demonstrates our commitment and compliance with safeguarding legislation.

Staff and volunteers working for Stepping Stones have a crucial role to play in noticing indicators of possible abuse or neglect and referring them to the correct persons or services for support and intervention. Everyone working or volunteering at Stepping Stones are trained to recognise signs of concern and in line with this policy must report concerns following school and local authority procedures.

Staff are updated on safeguarding issues frequently throughout the year. The Designated Safeguarding Leads will provide support to staff members. At Stepping Stones we will be attentive to any safeguarding issues and be in frequent contact with the schools we work with, ensuring the best interest of the students that we work with. We will work with local providers to promote learning from serious case reviews and local learning reviews on how to improve practice to prevent children from being harmed.

We believe that the welfare of every child is paramount, and we take safeguarding very seriously. Therefore, should staff have any concerns they feel are of a safeguarding nature, they are expected to report, record and take the necessary steps to ensure that the child is safe and protected and that key staff are aware promptly of any such concerns. We are aware that this can lead to challenges from parents/carers, but at all times we work collectively to ensure that the child is at the heart of all our decisions and that we act in their best interests.

1. **Outline and Aims:**

Safeguarding and promoting the welfare of children and young people is everyone’s responsibility. Everyone who comes into contact with children, their families and carers has a role to play in safeguarding them and promoting their welfare. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

No single professional can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt and restorative action. In line with this understanding, any adult working or volunteering with Stepping Stones has a responsibility to recognise when a child or student may be in need or be vulnerable in some way, and to respond to this recognition in a timely and appropriate way.

Through this policy Stepping Stones aim to create and maintain a safe environment and community where all young people, students and adults feel safe, secure and valued. We believe that creating strong relationships within our staff team and with our students is paramount and demonstrates our commitment to safeguarding all young people.

This policy has been developed to ensure that all adults in our organisation are working together to safeguard and promote the welfare of children and have the knowledge to identify and address any safeguarding concerns and to ensure practice is consistently good.

Stepping Stones aim to ensure that:

* All staff are aware of their statutory responsibilities with respect to safeguarding and will make informed and confident responses to specific safeguarding issues.
* Staff complete regular safeguarding training allowing them to stay up to date and relevant.
* Appropriate action is taken in a timely manner to safeguard and promote children’s welfare.
* Children and young people will be provided with appropriate safety and protection whilst in the care of Stepping Stones.

This policy is based on the Department for Education’s statutory guidance, Keeping Children Safe in Education 2024 and Working Together to Safeguard Children 2018, and the Ofsted Independent Schools Standards 2014. We comply with this guidance and the procedures set out by our local safeguarding children board.

1. **Purpose:**

The purpose of the policy is to ensure that the welfare of children is understood and promoted at all times. At Stepping Stones we believe that the welfare of the child is paramount.

We strive to ensure that all children regardless of their age, gender, ability, culture, race, language, religion or sexual identity are protected from harm in all its forms. All staff and volunteers have an equal responsibility to act on concerns, suspicions or disclosures that lead them to suspect or understand a child may be at risk of harm. As part of our duty of care we also work to ensure that students and staff involved in safeguarding and child protection issues receive appropriate support.

All staff and volunteers understand the process to complete if there are concerns or allegations about any adult working or volunteering in any of our schools during or outside of the normal working day.

The procedures contained in this policy apply to all staff, volunteers, sessional workers, students, agency staff or anyone working on behalf of Stepping Stones.

1. **Equality Statement**

Stepping Stones are a welcoming provision where everyone is valued highly and where tolerance, honesty, co-operation and mutual respect for others are fostered. We are committed to the development of the whole person, both students and staff, within a supportive, secure and creative environment. An appropriate curriculum offer provides equal opportunity for all pupils to maximise their potential regardless of age, sex, race, disability, religion or belief, sexual orientation, pupils who are pregnant or have recently given birth, or who are undergoing gender reassignment.

We endeavour to promote positive relationships with parents, young people and members of the wider community.

We aim to promote equality and tackle any form of discrimination and actively promote friendly relations in all areas of school life. We seek to remove any barriers to access, participation, progression, attainment and achievement. We take seriously our contribution towards community cohesion.

We welcome our duties under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations in relation to:

* Race
* Sex or gender
* Sexual orientation
* Gender reassignment
* Disability
* Age
* Religion or belief
* Marriage and Civil Partnership
* Pregnancy and maternity

We welcome our duty under the Education and Inspections Act 2006 to promote community cohesion. We recognise that these duties reflect international human rights standards as expressed in the UN Convention on the Rights of the Child, the UN Convention on the Rights of People with Disabilities, and the Human Rights Act 1998.

1. **Statutory Guidance and Legislation**

This policy is also based on the following legislation: Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils. The School Staffing (England) Regulations 2009, which set out what must be recorded 5 on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques. The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children. Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18 Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM. The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children. Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what ‘regulated activity’ is in relation to children Statutory guidance on the Prevent duty, which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism. The Childcare (Disqualification) Regulations 2009 (and 2018 amendment) and Childcare Act 2006, which set out who is disqualified from working with children. Our policy ensures that we work in partnership with other organisations, where appropriate, to identify any concerns about child welfare and take action to address them and that we comply with local policies, procedures and arrangements. Our policy complements and supports other relevant policies in the organisation.

1. **Definitions:**

**Safeguarding Definition:**

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

*(Working Together to Safeguarding Children, DfE 2018)*

**Child Protection Definition:**

Child Protection is a part of the safeguarding agenda. It refers to the action that is required to be undertaken to protect children who are suffering, or are likely to suffer, significant harm.

**This policy encompasses Child protection.**

Children includes everyone under the age of 18 (Children Act 1989 and 2004) and this is the term used throughout the rest of this policy.

Staff are trained and supported to understand the types of abuse that some children experience and work to the following definitions:

All schools are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues may overlap with one another.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect 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 others (e.g. via the internet). They may be abused by an adult or adults or another child or children. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and 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 insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), 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, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person 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 10 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.

**Neglect:** 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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

* provide adequate food, clothing and shelter (including exclusion from home or abandonment);
* protect a child from physical and emotional harm or danger;
* ensure adequate supervision (including the use of inadequate care-givers);
* ensure access to appropriate medical care or treatment;
* include neglect of, or unresponsiveness to, a child’s basic emotional needs.

**Child on Child Abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school’s policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on Child abuse is most likely to include, but may not be limited to:

* bullying (including cyberbullying, prejudice-based and discriminatory bullying)
* abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
* physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
* sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal whilst non-consensual is illegal and abusive.

1. **Prevention:**

We will establish and maintain an ethos where children feel safe and secure in an environment which allows them to learn, and develop on a journey to achieving their full potential. We will educate and support our children in an inclusive, supportive and non-judgemental environment.

Children understand that there are adults in school or within our provision whom they can talk to if worried, scared or facing difficulty. We will work hard to be a restorative staff team who actively listen and respond.

Staff development and awareness in respect of safeguarding is given the highest priority across the provision to ensure we all fully understand and implement the national and local agenda. All our staff and volunteers are required to read Keeping Children safe in Education (KCSiE) Part 1 and annex A. All staff are required to undertake annual safeguarding training and update training in line with KCSiE 2024.

Staff development ensures that all involved within Stepping Stones are alert to how mental health problems can underpin behaviour issues and recognise that under the Equality Act 2010, some mental health issues will meet the definition of disability. Processes ensure that pupils experiencing mental health problems are well supported effectively, working with external support where needed.

We provide a personalised curriculum, ensuring children develop skills and understanding on their journey to adulthood which will enable them to be safe; develop the skills to recognise healthy and unhealthy relationships; and where to find sources of support.

Children are supported in recognising risks in various forms including on the internet. That children understand what kind of physical contact and virtual contact is acceptable and are able to recognise inappropriate pressure from others, including that which threatens their personal safety and well-being and give them strategies to counter this.

Staff feel empowered to share safeguarding concerns in a prompt manner bringing them to the attention of the Designated Safeguarding Lead (DSL) and/ or the Head of Provision. Accepting that safeguarding is the responsibility of all in our community, staff feel able to ask safeguarding questions and receive appropriate feedback following up on concerns as part of this shared responsibility to safeguard children. All staff are trained on how to respond and report concerns. We strive to create outstanding working relationships that we provide a service for, allowing honest dialogue and communication between our provision and all schools we work with.

Emerging issues and themes are proactively addressed and fed back to the Schools and education provider that our students are enrolled at.

There is a clear approach to substance misuse (drugs and alcohol). Any issues of drugs and substance misuse are recorded and there are strategies to educate children appropriately delivered throughout our provision and curriculums.

We use the mechanisms and services available to understand the range of issues which may make a child vulnerable and ensure children and young people receive the most appropriate support or referral and access to other provision; actively supporting multi agency planning for those children and, in doing so, providing information about the ‘voice of the child’ and the child’s personal experiences and perspectives as evidenced by observations or information provided.

Our provisions’ arrangements for consulting with, listening and responding to students are that we make sure that our children know that members of staff are always prepared to listen to them. Children are made aware that they can report any concerns verbally to any member of staff, and we will act upon this.

Members of our staff are mindful of the need to actively listen to children at all times during the day. Staff members are asked to report the content of these conversations to the DSL’S through established meeting structures, whether or not there are concerns expressed by the children. We do this to ensure that we have a constant overview about how our children are feeling throughout the year. Any safeguarding issues or concerns will be reported back to the student's education provider and a plan of action will be put in place.

Our provisions arrangements for consulting with, listening and responding to parents/carers are that we keep channels of communication open at all times. Staff are always available to listen and respond to parents/carers, either in person, or by telephone or email.

There is a commitment to the continuous development of staff with regard to safeguarding training:

* All staff access training annually
* The Designated Lead’s complete safeguarding training on a biannual basis.

1. **Roles and Responsibilities**

At Stepping Stones, safeguarding and child protection is the responsibility of every staff member, including those involved in extended school and off-site activities. To ensure the safety and wellbeing of all children, staff members will:

* Read and understand the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2024, including Annex A, and review this guidance annually.
* Ensure staff are open, honest, and adhere to the self-declaration regarding the Childcare (Disqualification) Regulations 2009 (and 2018 amendment) and Childcare Act 2006.
* Attend training and briefings as required to ensure they are aware of signs of abuse/neglect and other necessary safeguarding updates.
* Provide a safe environment for children and be approachable and responsive to any allegations.
* Attend multi-agency meetings when required.
* Ensure any issues or concerns are reported promptly.
* Ensure Schools or other educational providers are aware of any concerns (DSL’S being made aware of any issues).

Additionally, Stepping Stones staff will be aware of:

* Our safeguarding systems, including the role of the designated safeguarding leads (DSL’S), the behaviour policy, and our safeguarding policy.
* The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
* What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
* The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM, and radicalisation.

The designated safeguarding lead (DSL) holds primary responsibility for child protection and wider safeguarding at Stepping Stones. Stepping Stones will promptly report to each school or education provider if alerted or are made aware of any safeguarding related issues. We make it our priority to discuss any issues or concerns with the designated safeguarding leads of the schools or educational providers that we work with.

Stepping Stones will ensure that the DSL’S are prompt with their reports to schools or educational providers. Stepping Stones DSL are required to:

* Complete DSL training biannually.
* Ensure that they are up to date with any relevant safeguarding policies.

1. **Confidentiality**

We prioritise seeking consent from parents before sharing any information, unless doing so would put the child at risk. Information should only be shared on a strictly "need-to-know" basis, unless the child is at risk of or currently experiencing serious harm, in which case consent is not necessary. Staff should avoid making promises to children regarding confidentiality, as this may not serve their best interests. Our policy also addresses confidentiality in relation to record-keeping in section 11.

1. **Whistleblowing/Confidential Reporting**

Safer culture - As part of our approach to safeguarding, we have created and embedded a culture of openness, trust, and transparency where all concerns are dealt with promptly and appropriately.

Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.

As part of our ongoing commitment to safeguarding we work to ensure we have a culture where everyone has a voice. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the provision’s safeguarding regime and know that such concerns will be taken seriously.

If there are concerns about a colleague, or any other adult in our setting then these should be shared with the Head of Provision.

If a staff member feels unable to raise an issue within our setting, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

* General guidance on whistleblowing can be found via: [advice on whistleblowing](https://www.gov.uk/whistleblowing)
* The NSPCC’s [what you can do to report abuse](https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/) dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have anxiety about doing so - 0800 028 0285.

1. **Notifying Parents**

Communication with parents or guardians is an important aspect of safeguarding children. If a concern arises about a child's welfare or safety, it will be discussed with the designated safeguarding lead of Stepping Stones and a plan of action will be discussed the the DSL of the student’s current school, educational provider, or provision. Other staff members may only talk to parents or guardians about concerns with prior consultation with the designated safeguarding lead. In some cases, if informing parents or guardians of concerns may increase the risk to the child, we will first contact the school, education provider or provisions DSL and then seek advice from the local authority children's social care team before taking any further steps.

1. **Allegations of abuse made against other pupils: Peer on Peer abuse, Sexual violence or Harassment**

At Stepping Stones, we understand that peer on peer abuse can occur and we have a zero tolerance approach towards it. Any allegations of such behaviour will be dealt with under our child protection and safeguarding policy, especially if the behaviour is serious and potentially a criminal offence, violent, could put pupils at risk, or involves sexual exploitation or abuse, among other things. We believe that such behaviour is not just "banter" or "part of growing up", and it will not be minimised.

If a pupil makes an allegation of abuse against another pupil, the designated safeguarding lead (DSL) will be informed, and the allegation will be recorded, and contact will be made with their current provider. The DSL will then contact the local authority children's social care team and the police, if necessary, and will follow their advice. A risk assessment and support plan will be put in place for both the victim(s) and the child(ren) against whom the allegation has been made.

We work to minimise the risk of peer-on-peer abuse by challenging any derogatory or sexualised language or behaviour, being vigilant to issues that may affect different genders, and ensuring that our staff team educates pupils about appropriate behaviour and consent. Our staff are also trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

We believe that it is important to protect all students within our provision, and that means taking allegations of peer-on-peer abuse seriously and dealing with them appropriately. Our approach to safeguarding and child protection ensures that all pupils have a safe and supportive environment in which to learn and grow. We also believe in an interest-led approach to learning, which engages our young people and supports their development in a holistic manner.

1. **Attendance**

We believe attendance can be a safeguarding issue. Therefore, attendance logs will be taken, and students’ schools, educational provider or provision will be notified of attendance or any absence. We will work with schools and other education providers to promote regular attendance. Contact with parents/guardians will be made if Stepping Stones are unaware of the whereabouts of any student.

1. **The Curriculum**

At Stepping Stones, we offer a student-centred curriculum. We pay attention to Students EHCP’S and will specifically work towards meeting their targets set. Our offer is based around sports and health related qualifications allowing students to enjoy their time with education and hopefully promote a desire to achieve within that sector. Students will also gain vital real-life experiences throughout our English and maths offer as well as experiencing a range of activities and roles within the community. We believe that by creating a safe and supportive learning environment that promotes emotional well-being, our students will be better equipped to deal with the challenges they may face both in school and beyond.

1. **Online Safety**

At Stepping Stones, we recognise that e-safety is a critical safeguarding issue that needs to be addressed at all levels. It is our responsibility to equip young people with the necessary knowledge, skills, and attitudes to stay safe and thrive in the digital world. To achieve this, we will ensure that students engage with discussions and conversations regarding safety on the internet. Stepping Stones will also offer Super Learning days surrounding online safety and other PSHE topics.

Signed: J.L. ROSCOE

Head of Provision – Joshua Lee Roscoe

Date: 15/08/2024

**Evidence of Understanding:**

I have read and fully understood the content of the Stepping Stones Safeguarding Policy. I acknowledge the importance of following the guidelines and procedures outlined in the policy to ensure the safety and well-being of the children and young people under our care. I am committed to upholding the principles of safeguarding and will adhere to the protocols in place to identify, report, and respond to any safeguarding concerns.

By signing below, I confirm that I have reviewed and comprehended the contents of the Safeguarding Policy. I pledge to carry out my responsibilities in accordance with the policy's provisions and to prioritise the safety and protection of all our pupils.

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Please print and sign this form and return it to the Head of Site (Joshua Roscoe) to acknowledge your understanding of the Safeguarding Policy and your commitment to its implementation.