Little Gems
Wellbeing Centre

Safeguarding Policy V4

Policy Statement

We have a duty of care to children, young people and adults-at-risk participating in equestrian activities on our premises or at events organised by us. We have a responsibility to conduct our activities in a manner that affords protection, assure their welfare, and keeps them safe. We have also a legal obligation to do so, irrespective of age, sex, disability, race, parental or marital status, pregnancy, religion or belief, creed, sexual orientation and gender reassignment. We recognise that some individuals, for example from minority ethnic groups or disabled people, may face additional the barriers with communication or the impact of discrimination.

This duty of care applies any person that has a direct association with us and who is in a 'position of trust'. A 'position of trust' includes those that have:
- Regular, unsupervised access children, young people and adults-at-risk; and
- Coach, teach, train, supervise or instruct; and
- Is regardless of whether they are contracted, employed or volunteer.

A child/young person is defined (the Children Act 1989) as a person under the age of 18.

An adult-at-risk is defined (the Care Act 2014) as a person who:
- Needs care and support.
- Is experiencing, or is at risk of, abuse or neglect, and is unable to protect themselves from either the risk, or the experience of, abuse or neglect.

We have adopted fully the Safeguarding Policy of the Association of British Riding Schools, Livery Yards and Riding Establishments (ABRS+).

All individuals involved with us, no matter what their role (whether staff or volunteer), must adhere to this Safeguarding Policy.

Our Commitment

We are committed, through our Safeguarding Policy and Procedures, to:
- Ensuring robust safeguarding arrangements and procedures are in operation to provide children, young people and adults-at-risk with appropriate safety and protection while on our premises or participating in events organised by us.
- Taking all reasonable, practical steps to protect children, young people and adults-at-risk from harm, discrimination and degrading treatment and to respect their rights, wishes and feelings.

- Ensuring that staff understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities that will enable them to recognize, identify and respond to signs of abuse, neglect and/or other safeguarding concerns.
- Ensuring appropriate action is taken in the event of incidents/concerns of abuse and provide support to the individual(s) who raised or disclosed the concern. All concerns or allegations of poor practice or abuse are taken seriously and responded to swiftly and appropriately. It is the responsibility of child protection and other experts to determine whether or not abuse has taken place but it is everyone's responsibility to report it.
- Ensuring that confidential, detailed and accurate records of safeguarding concerns are maintained and securely stored.
- Maintaining high standards of behaviour and good practise through compliance with ABRS+ Codes of Conduct. The policy and procedures are mandatory for everyone that that has a direct association with us. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion.

The policy will be reviewed in the following circumstances:
- Changes in legislation and/or government guidance.
- As required by the Local Authority, the ABRS+ and/or the BEF.
- As a result of any other significant change or event.

Designated Safeguarding Lead and Deputy Safeguarding Lead
We have an appointed a Designated Safeguarding Lead (DSL) "Hayley James" and a Deputy Designated Safeguarding Lead (DDSL) "Samantha Hellmann" The role of the DSL / DDSL is to:

- Work with those in a position of trust and with parents and carers to ensure that the environment at our Riding Establishment is appropriate, positive and embracing.
- Ensure that children, young people and adults at risk and their parents and carers are aware of this policy.
- Ensure that those that are in a position of trust are aware of this policy and of any associated procedures and guidelines.
- Ensure that ABRS+ Codes of Conduct are available to those that are in a position of trust, and to the parents and carers of children, young people and adults at risk.
- Promote, provide and/or undertake safeguarding and first aid training for those are in a position of trust.
- Receive queries and offer support regarding safeguarding concerns or issues.
- Ensure confidentiality is maintained and information is only shared to those that have a need to know.
- Respond to any allegations or complaints made.
- Communicate with the Proprietor, Directors, Trustees and/or Yard Manager (as required) regarding concerns or issues.
- Maintain contact details for the ABRS+, Local Authority and Police.

Designated Safeguarding Lead – Hayley James 07868 736422 **Deputy Designated Safeguarding Lead –** Samantha Hellmann 07554 428526

Dealing with a Disclosure

It is not the role of the DSL/DDSL to be a Child Protection expert or to determine whether a serious incident has taken place. Their role is to record the details and seek guidance.

The DSL/DDSL will adhere to the following procedures if a child, young person or adult at risk discloses that they have been abused; we will:

- Find time and a suitable place to listen to the individual when information about possible abuse comes to light. We will do so without displaying shock, disbelief or attempting to lead
- Allow the individual to talk freely, and not cross examine, interview, probe or ask to see any injury that is not visible.
- Find out just enough to be sure of the need to refer
- Not make false promises and not promise confidentiality, explaining that the information may need to be passed on to other professionals
- Reassure, stress that it was the right thing to tell someone, and explain what has to be done next and who has to be told
- Not criticise or question the alleged perpetrator.

The DSL/DDSL will make records that are factual, accurate and relevant and that avoid subjective judgements. The DSL/DDSL will record the following information:

- The facts about the allegation or observation.
- A description of any visible injuries or signs.
- The individual's account, if this has been disclosed, of what has happened and how any injuries occurred.
- Any witnesses to the incident(s).
- Any times, dates or other relevant information
- A clear distinction between what is fact, opinion or hearsay.
- A record of any non-verbal behaviours
- Action taken as a result of the concern
- The name, address and date of birth of those involved.

The DSL/DDSL will report disclosures of abuse to the Local Authority, the Police and the ABRS+ Safeguarding Officer.

Employing Staff and Using Volunteers

We will ensure, when employing staff, that:

- Staff (full-time, part-time or self-employed) and volunteers are recruited safely and fairly, and that the safety of children, young people and adults at risk is considered at every stage of the recruitment and employment process.
- For any role that places an individual in a position of trust, the job description and person specification will highlight the importance of understanding safeguarding issues. • All individuals, staff or voulteering for Little Gems Wellbeing Centre, will have been subject to criminal record check and have received a certificate issued by the Disclosure and Barring Service, Disclosure Scotland or Access NI as appropriate prior to having unsupervised access to children, young people and adults at risk.

Training for Staff in Positions of Trust

We will ensure that those in a position of trust:

- Undertake BEF-approved:
- Face-to-face safeguarding training (or a recognised equivalent) course within the last 3 years. This will be undertaken as part of their induction unless they can evidence that they have undertaken the course with another BEF member body in the last three years.
- Online refresher training every three years or a further face-to-face course.
- Where they coach ridden activity, undertake First Aid at Work training from a recognised provider, with refresher training being undertaken every three years.

Use of Photographs and Films

We will wish to share photographs and films of our activities which can help us celebrate the successes and achievements of our children, young people and adults at risk. We recognise, however, that children, young people and adults at risk, together with their parents and carers, have a right to decide whether their images are taken and how these may be used.

We will seek to keep children, young people and adults at risk safe by:

- Always asking for written consent by parent / carer before taking and using an image • Always explaining what images will be used for, how they will be stored and what are the potential risks
- Making it clear that if an image has already been shared with consent, it may not be possible to delete images that have already been shared or published
- Never publishing personal information about individuals and disguising any identifying information
- Being clear about how images of children will be securely stored and for how long
- Using images that positively reflect an individual's involvement in an activity

CCTV on site

Please note that Old Tiger Stables has a robust CCTV system in place which covers more than 90% of our working areas. This includes courtyard, barns, main yard area, arenas,

parts of the livery yard and entrance area to some fields. There is some visibility to inside stables although not all stables are covered internally.

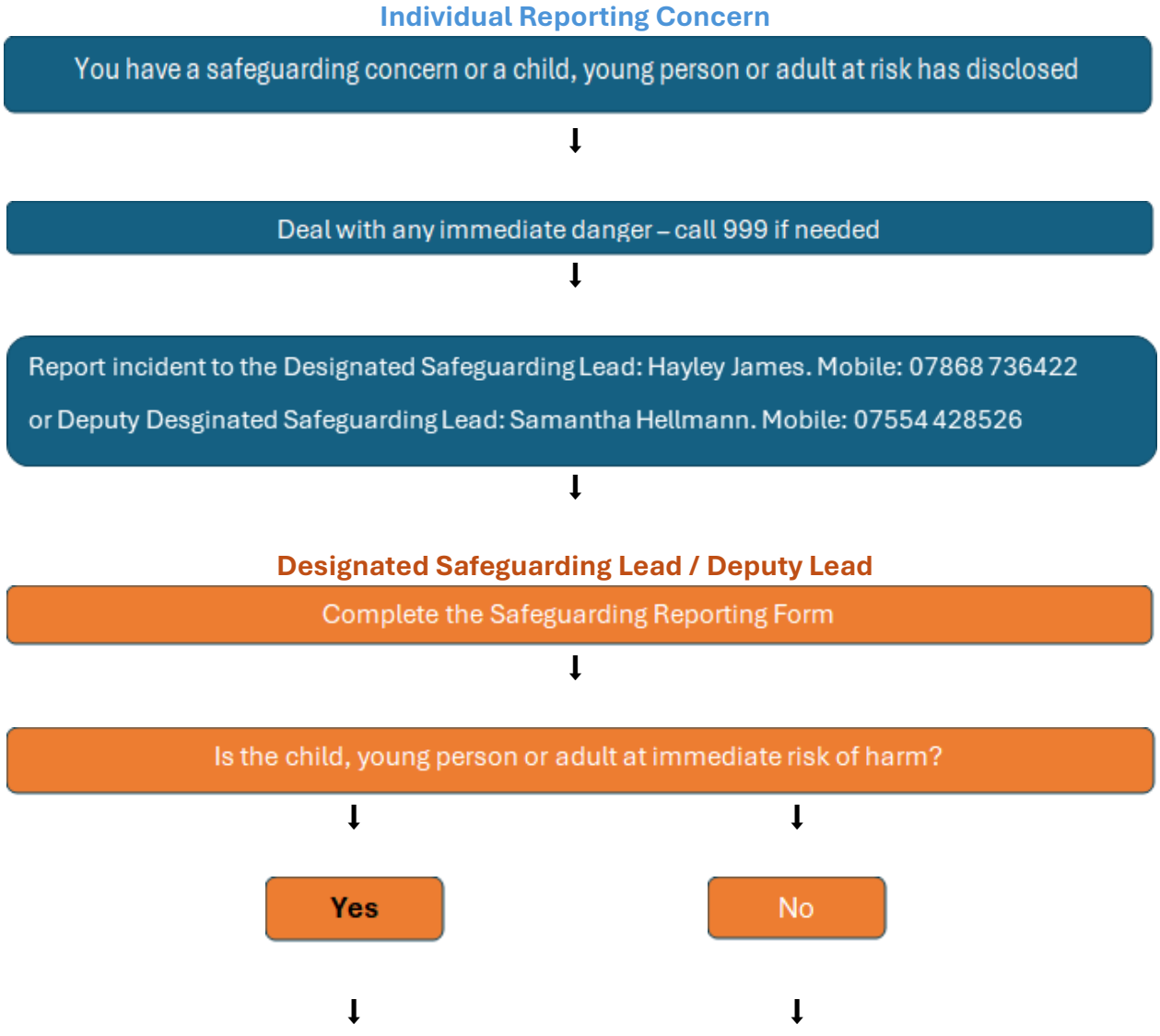
Commitment to Communicate

We will make available our Safeguarding Policy and Procedures to staff in a position of trust, parents, and carers and will publish these on our website.

We will publish the name and number of the Human Welfare Officer (Hayley James 07868 736422) within our Emergency Contacts which are displayed on Notice Boards.

Local Authorities publish details on how to report a safeguarding concern on their websites.

Reporting a safeguarding concern



Ring 999 if in immediate danger

Report concern immediately to Local Authority Safeguarding Team - safeguardingcambspeterborough.org.uk/concerned/professionals-reporting-a-concern

Inform ABRS+ Safeguarding Officer at earliest opportunity (George Baber 07585 301454)

Report concern immediately to Local Authority Safeguarding Team - safeguardingcambspeterborough.org.uk/concerned/professionals-reporting-a-concern

Inform ABRS+ Safeguarding Officer at earliest opportunity (George Baber 07585 301454)

Definitions of Safeguarding abuse and neglect

(Working Together' 2018 and 'Keeping Children Safe in Education' 2024)
Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- children from maltreatment;
- 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; and
- taking action to enable all children to have the best outcomes.

Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another;
Development means physical, intellectual, emotional, social or behavioural development;
Health includes physical and mental health; maltreatment includes sexual abuse and other forms of ill-treatment which are not physical.
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.
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 (Fabricated Induced Illness).
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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, 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 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Definitions and procedures for specific safeguarding situations

In addition to the situations below the LSCP (local safeguarding childrens partnership) policy and procedures manual maintains an extensive section on 'Children in Specific Circumstances' – (section 5) that DSL and any deputy DSLs should be familiar with.

Children and the court system: Children are sometimes required to give evidence in criminal courts. There are two age- appropriate guides to support children Going to Court 5-11 year olds and 12-17 year olds.

Children Missing out on Education: Missing school can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may involve sexual abuse or exploitation and child criminal exploitation. It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child missing school in the future. It is the school's duty to notify the local authority of any children who go missing from school and cannot be found at the known place of residence.

Children with family members in prison: Little Gems Wellbeing Centre understands that children with a parent(s) in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. They may require specific services and support. Families and children of people in prison will be seen as families first and school will work to ensure

their needs are appropriately met. This will include providing support to ensure the voice of the child is considered when seeking contact with a family member in prison. Support is available from the National Information Centre of children of offenders NICCO who provide information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child Sexual Exploitation (CSE): is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (2017). Staff are trained in recognising the key indicators of CSE and understand their role in the prevention of CSE and the importance of awareness within the curriculum e.g. within the teaching of Healthy Relationships.

If staff identify children for whom CSE may be a concern they will apply the usual referral process and Child Protection procedures and pass this information to the Designated Safeguarding Lead (DSL). The DSL will make referrals to the CSC as appropriate. The company also appreciates that they have a role to play in sharing soft intelligence in relation to perpetrators of CSE, and therefore if such information should come to light within sessions the DSL will share this appropriately with the police on Tel: 101.

Child Criminal Exploitation: County Lines and Cyber Crime

Little Gems Wellbeing Centre recognizes that criminal exploitation of children is a geographically widespread form of harm that can affect children both in a physical and virtual environment. We recognise that the experiences of boys and girls being exploited may be very different; appropriate support will be given to address the individual needs of our children.

County Lines Criminal Activity: Drug Networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines is missing school episodes, when the victim may have been trafficked for the purpose of transporting drugs. Mind Jam will consider whether a referral to the National Referral Mechanism (NRM) should be undertaken in order to safeguard that child and/or other children. First responders' organisations e.g. the local authority can complete the referral, on the company's behalf, online.

Cybercrime Involvement: Organised criminal groups or individuals exploit children and young people due to their computer skills and ability, in order to access networks/data for criminal and financial gain.

There are a number of signs that may indicate a child is a victim or is vulnerable to being exploited which include:

- missing from school
- showing signs of other types of abuse/aggression towards others
- having low self-esteem, and feelings of isolation, street or fear
- lacking trust in adults and appearing fearful of authorities
- having poor concentration or excessively tired
- becoming anti-social displaying symptoms of substance dependence
- excessive time online computer/gaming forums
- social Isolation in school with peers
- high-functioning with an interest in computing

This is not an exhaustive list and we are aware of other factors which may also impact on the child. Like with all other safeguarding concerns, if our children are in this situation, support will be provided through the company or partner agency. Further advice and support regarding concerns of this nature can be found in the contacts section. **Domestic Abuse and Operation Encompass:** The cross-government definition of domestic violence and abuse is:

- any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.
- actions that encompass, but are not limited to a psychological, physical, sexual, financial and emotional impact.
- controlling behaviour that includes a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
- coercive behaviour that includes an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. If staff identify children for whom Domestic Abuse may be a concern they will apply the usual referral process and Child Protection procedures and pass this information to the Designated Safeguarding Lead (DSL). The DSL can then refer cases where relevant, to Cambridgeshire's Customer Services. Where domestic abuse notifications are received from the Multi-Agency Risk Assessment Conference (MARAC), this information will be added to a child's chronology and child protection record to ensure that appropriate support can be provided where necessary. A coding system will be in place.

Homelessness: Being homeless or at risk of homelessness presents a real risk to a child's welfare. The DSL (and deputy) is aware of contact details and referral routes into the Cambridgeshire Housing Authority so they can raise /progress concerns at the earliest opportunity. We refer to the Homeless Reduction Act Factsheets which summarises the new duties that focus on early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

'Honour-based' violence (including Female Genital Mutilation and Forced Marriage): So called 'honour-based violence' (HBV) encompasses incidents or 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. All forms of HBV are abusive and should be handled and escalated as such. Our staff are alert to the possibility of a child being at risk from HBV, or have already suffered HBV and understand the duty on them to protect the welfare of these children **Female Genital Mutilation/FGM** We understand that Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Staff know that FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

The reporting of FGM is a mandatory duty

Our teachers are aware that Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon them (and those employed or engaged to carry out teaching work) to report to the police where they discover that FGM appears to have been carried out on a girl under 18 years of age. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining children. We refer to the DfE guidance Mandatory reporting of female genital mutilation procedural information Teachers must personally report to the police, cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases. In these cases, teachers will follow usual safeguarding procedures reporting to DSL. **Forced Marriage:** A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Our staff understand that, likewise, this is a potential safeguarding issue and that they must pass on concerns by applying the usual referral process and Child Protection procedures and passing this information to the Designated Safeguarding Lead (DSL). We refer to The Forced Marriage Unit on Tel; 020 7008 0151 and their statutory guidance; https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322310/HMG_Statutory_Guidance_publication_180614_Final.pdf **Preventing Radicalisation, The Prevent Duty and Channel:** Children are vulnerable to extremist ideology and radicalisation. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection and report concerns to the DSL. Under section 26 of the CounterTerrorism and Security Act 2015, we are aware that we must have due regard to the need to prevent people from being drawn into terrorism, and that this is known as the Prevent Duty. In order to fulfil the Prevent Duty, staff have received information/training to help them to identify children who may be vulnerable to radicalisation, and the company is committed to

accessing further training to ensure that all staff are up to date and aware of this duty. If a staff member identifies children for whom this may be a concern they should apply the usual referral process and Child Protection procedures and pass this information to the Designated Safeguarding Lead (DSL). If the individual is at immediate risk of harm or immediate risk of terrorist related activity then the Police should be contacted on 999. If there is no immediate risk, the Designated Safeguarding Lead will contact the Cambridgeshire Prevent team to seek further help. The Prevent officer may be able to support the company or may decide that a referral into the Channel process is required. Channel guidance. It may be decided that there are no Prevent related concerns but a referral into Cambridgeshire Customer Services is required.

Radicalisation will also be considered within current Online Safety policies, procedures and curriculum in terms of having suitable filtering and monitoring in place and raising awareness with staff, parents and children about the increased risk of online radicalisation, through the use of the internet, Social-Media and Gaming.

We refer to the Prevent duty guidance: for England and Wales which contains information for schools.

Child on Child Abuse: All staff are aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but not limited to:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- abuse in intimate relationships
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, distress or alarm;
- nudes/semi-nudes (sexting); and
- initiation/hazing type violence and rituals;

Body Shape: Young people come under increasing pressure to conform to so-called ideals by peers, adults, sometimes parents, the mass media, through social media and through their own view of themselves. Research shows more than half of young people worry about the way they look, and this can lead to withdrawal, isolation, emotional and at its extremes serious physical harm. We work assertively to tackle these values, support individuality and body confidence at the company and encourage young people to work together to present a positive and healthy view of body shape.

Bullying: Bullying is a form of abuse and can cause serious anxiety and distress and further safeguarding risks. It comes in many different forms which are detailed in this appendix. All bullying including cyber bullying and prejudice-based bullying must be reported and will be managed through our anti- bullying procedures. The company will make a child protection referral if required. Staff are fully trained to deal with bullying and support children who are

being bullied. Staff recognise the different levels of bullying and the seriousness of racist, homophobic and gender related bullying. We recognised that, whilst those who are bullying may need sanctions put in place, we also recognise that they may be in need of support and we will engage with appropriate services to address this.

Serious Violence: All staff are aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal network or gangs.

All staff are aware of the associated risks and understand the measures in place to manage these. We refer to the Home Office publication for advice and guidance. https://www.gov.uk/government/publications/advice-to-schools-and- colleges-on-gangsand-youth-violence and https://www.gov.uk/government/publications/criminal-exploitation-of-children-andhttps://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-linevulnerable-adults-county-line

Sexual Violence and Sexual Harassment: Staff are aware of sexual violence and sexual harassment and that children can, and sometimes do, abuse their peers in this way. Sexual violence refers to Rape, Assault by Penetration and Sexual Assault as described in the Sexual Offences Act 2003. Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. Staff understand that when we reference sexual harassment we do so in a context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Neither is acceptable and will not be tolerated by the company. Art Ed takes all such reports seriously and they will receive the same high standard of care that any other safeguarding concern receives. A multi-agency approach will be undertaken when responding to all such complaints; however the company will always take immediate action to protect children despite the actions of any other agency. These actions may include an immediate risk assessment in respect of the needs of the child victim and will address any risks identified to any child in respect of an alleged perpetrator of sexual violence or sexual harassment to ensure children are protected from harm. Any risk assessment will be fluid and may change to reflect any developments during the management of the case.

All such reports will be managed by the Designated Safeguarding Lead. There are a number of options the company may consider in respect of the management of a report of sexual violence or sexual harassment between children and each case will receive an appropriate bespoke response once all the facts are known. Irrespective of any potential criminal outcome, the company has a duty to safeguard all children and may deal with any such report on a balance of probability basis when considering the outcomes for children

involved. Any report of sexual violence will trigger the company to do a risk assessment to consider

- the needs of the victim and their support and protection
- any other potential victims
- the perpetrators and,
- all other children, and if appropriate, students and staff if protection is required against the perpetrator.

This risk assessment does not replace those assessments carried out by professionals but helps the company decide on the next course of action particularly in relation to keeping the victim and other potential victims safe from harm or distress. The assessment may result in reorganisation of classes or transport arrangements, for example to ensure that the victim and perpetrator and not in close proximity. Any decisions will be made based on the wishes of the victim, the nature of the incident and the safety of others. Actions will be taken immediately to reduce risk and undue distress and assessments will be reviewed regularly.

The outcome of a report of sexual violence may be that we will manage the situation within our own processes, request early help from the local authority, report the incident to social care or report to the Police. All reports will be reviewed and potential lessons to be learnt by the **company** will be considered.

We recognise in our company that reporting of the above can be difficult for children and therefore we provide a range of ways in which children can let us know of their concerns and we will promote these regularly. We will adopt an understanding that it could and is most likely happening in our company and not depend on reporting to dictate actions. We will develop a 'zero tolerance' approach and not judge any disclosure as 'low level' or acceptable. We understand that child on child abuse happens anywhere. The way we respond to a concern is likely to have a long- lasting impact on how others react if they wish to disclose therefore we are very aware of ensuring appropriate support is in place. We will continue to reflect on our approaches using the experiences of children and families to guide this. If we find the information to be false, unfounded or malicious, we will also reflect and act on if necessary, why this disclosure was made and any potential 'cry for help' that could escalate into a safeguarding concern. Support will also be considered for the perpetrator in order to reduce harmful behaviour and potential risk to others. All staff have received the appropriate level of training to be able to respond to sexual abuse and harassment incidents.

Our behaviour policy provides further information on the process followed by the company and all staff have read and understood this policy.

Upskirting 'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. Staff will always act in the best interests of a child and follow usual safeguarding procedures.

Consensual and non-consensual making or sharing of nudes and semi-nudes images and/or videos (sexting or nudes)

https://www.gov.uk/government/publications/sharinghttps://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-peoplenudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-younghttps://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-peoplepeople

Where there is a disclosure or the company becomes aware that a child may have been involved in making or sending nudes or semi-nudes images or videos which is sometimes referred to as 'sexting', it will refer to the guidance in the document 'Sexting in Schools and Colleges, Responding to incidents and Safeguarding young people' published by the UK Council for Child Internet Safety (2016).

Staff understand that when an incident comes to their attention the incident should be referred to the DSL as soon as possible. The DSL will then hold an initial review meeting with appropriate company staff and subsequent interviews with the young people involved (if appropriate). Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately

We will refer to the following guidance if appropriate: The DfE guidance 2018 on Searching Screening and Confiscation Advice for Schools

Contextual Safeguarding: Litle Gems Wellbeing Centre recognises that safeguarding incidents and/or behaviours can be associated with factors outside the sessions and/or can occur between other children. All staff, but especially the designated safeguarding lead will consider 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. The company will provide as much information as possible to children's social care as part of any referral undertaken.

https://www.contextualsafeguarding.org.uk/

Carrying Knives/offensive weapons and gang culture: If a member of staff suspects a child of being involved in gang culture, this is a Safeguarding concern and will require a discussion with the Designated Safeguarding Lead who will seek advice from agencies and professionals including reference to the Safeguarding procedures as outlined by the local authority. The child may be an exploited child and victim to which the company will offer support

Children who may require Early Help All Staff working within the company are aware safeguarding is not just about protecting children from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:

- children's health and safety and well-being, including their mental health

- meeting the needs of children who have special educational needs and/or disabilities.
- the use of reasonable force
- meeting the needs of children with medical conditions
- intimate care and emotional well-being
- online safety and associated issues
- appropriate arrangements to ensure children's security taking into account
- the local context.
- young carers;
- privately fostered children;
- children who have returned home to their family from care:
- children showing signs of engaging in anti-social or criminal behaviour;
- family circumstances presenting challenges for the child, such as substance abuse, adult mental health, domestic violence; and/or
- early signs of abuse and/or neglect;
- signs of displaying behaviour or views that are considered to be extreme;
- children misusing drugs or alcohol themselves:
- not attending school or are at risk of exclusion from school;
- frequently going missing/goes missing from care or from home;
- risk of modern slavery, trafficking, exploitation, radicalised;
- not in education, training or employment after the age of 16 (NEET);
- unborn babies – LSCP pre-birth protocol

These children are more vulnerable and therefore the company will identify who their vulnerable children are, ensuring all staff and volunteers know the processes to secure advice, help and support where needed. We refer to the guidance for Early Help at https://www.cambridgeshire.gov.uk or via our email address littlegemswellbeing@outlook.com

Children with special educational needs and disabilities or physical health issues:
SEND officers are available for every child and family across the country. Special consideration should be given to safeguarding and protecting children who may have additional vulnerabilities. Additional barriers can exist to the recognition of abuse and neglect which can include assumptions that indicators of abuse such as behaviour, mood and injury relate to the child's disability without further exploration. It is common to see a disability first and abuse second which may delay support required. Vulnerable children can be disproportionately impacted by things like bullying and abuse, without outwardly showing any signs. There may also be communication barriers and difficulties in overcoming these barriers

These additional challenges are addressed through a high level of pastoral care and communication and interaction with our young people. These communication tools may include Makaton, communication in print and Colourful Semantics to ensure the child's voice is heard despite their additional needs. Our communication with parents will be frequent and informative allowing on-going risk assessments to be carried out to avoid any

assumptions being made in relation to any change in behaviour or physical appearance.
Online safety: Young people are increasingly using mobiles phones, tablets and computers on a daily basis. While mobile devices are a source of fun, entertainment, communication and education we know that some adults and young people will use these technologies to harm young people. The harm might range from hurtful and abusive texts and e-mails, to enticing young people to engage in sexually harmful conversations, webcam photography or face-face meetings. Our e-safety policy explains how we try to keep young people safe in the home. The company follows UK Council for Internet Safety and Department for Education Guidance around sexting and staff will immediately report concerns to the Designated Safeguarding Lead.
"Chatrooms" and social networking sites are the more obvious sources of inappropriate and harmful behaviour and young people cannot access these on our IT system. We will work with young people on how to maintain their own safety and how to summon help if they are concerned about what they see online. Some young people will undoubtedly be chatting on mobiles or social networking sites at home and parents are encouraged to consider measures to keep their young people safe.
The staff Code of Conduct provides further advice and guidance regarding the use of social networking and electronic communication with young people in our care.

Our online safety lead is Hayley James. Contact details are:
littlegemswellbeing@outlook.com 07500 781873

Private Fostering: Private fostering is when a child or young person under 16 years old (or 18 if they have a disability) is to be looked after for a period of 28 days or more by someone who is not a close relative, guardian or person with parental responsibility. Close relatives include parents, step-parents, aunts, uncles and grandparents.
By law, the local authority must be told about all private fostering situations. The child's parents, private foster carer and anyone else (including the company) involved in the arrangement are legally required to inform the local authority.
It is then the local authority's legal duty to make sure all private fostering arrangements are safe for the child or young person. Once informed of the arrangement the local authority will check the suitability of private foster carers, make regular visits to the child or young person and ensure advice, help and support is available when needed.
Substance Misuse: Little Gems Wellbeing Centre takes a serious view of substance misuse while recognising that young people may get caught up in misusing substances through vulnerability or exploitation. All cases of substance misuse should be brought to the attention of the Head teacher who will consider both the student behaviour policy and any factors that may indicate a young person is in need of help or protection
Trafficking and exploitation The two most common terms for the illegal movement of people – 'trafficking' and 'smuggling', are very different. In human smuggling, immigrants and asylum seekers pay people to help them enter the country illegally; after which there is no longer a relationship. Trafficked victims are coerced or deceived by the person arranging

their relocation. On arrival in the country of destination the trafficked child or person is denied their human rights and is forced into exploitation by the trafficker or person into whose control they are delivered.
Young people are a special case, any child transported for exploitative reasons is considered to be a trafficking victim, whether or not they have been deceived. This is partly because it is not considered possible for young people to give informed consent. Even when a child understands what has happened they may still appear to submit willingly, to what they believe to be the will of their parents.
Any concerns about trafficking and exploitation will be reported by the company to Customer Services immediately.

Body Map Guidance
Body Maps should be used to document and illustrate visible signs of harm and physical injuries. Always use a black pen (never a pencil) and do not use correction fluid or any other eraser. Do not remove clothing for the purpose of the examination unless the injury site is freely available because of treatment.
*At no time should an individual member of staff take photographic evidence of any injuries or marks to a child's person, the body map should be used. Any concerns should be reported and recorded without delay to the Customer Service Centre or the child's social worker if already an open case to social care.
When you notice an injury to a child, try to record the following information in respect of each mark identified e.g. red areas, swelling, bruising, cuts, lacerations and wounds, scalds and burns:

- Exact site of injury on the body, e.g. upper outer arm/left cheek.
- Size of injury - in appropriate centimetres or inches.
- Approximate shape of injury, e.g. round/square or straight line.
- Colour of injury - if more than one colour, say so.
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot?
- Does the child feel hot?
- Does the child feel pain?
- Has the child's body shape changed/are they holding themselves differently?

Importantly the date and time of the recording must be stated as well as the name and designation of the person making the record. Add any further comments as required.
Ensure First Aid is provided where required and then recorded appropriately.
A copy of the body map should be kept on the child's concern/confidential file.
Safeguarding is everyone's responsibility.

Complaints against staff

Complaints to be made against staff should be made to:

- Lorraine Webster proprietor.
- Lorraine@oldtigerstables.co.uk
- 07887 637121

★ If the complaint relates to an allegation of ill treatment of a child, young person or adult at risk, then please also contact the safeguarding officer When a complaint is received the following details will be recorded:

- Name of complainant, their contact details, date of receipt, nature of the complaint.

We will acknowledge receipt of the complaint within 2 working days.

Depending upon the nature of the complainant to discuss the complaint before initiating an investigation, or initiate an investigation to ascertain the facts

Once an investigation has been initiated, we will aim to respond to the complainant within 5 days and provide them with either of the following outcomes:

- The complainant has been investigated and that the matter is now closed, or
- The complaint has been referred to a competent authority for resolution. We are often not able to divulge the findings of an investigation to a complainant or any third party because of the information has elements that must remain confidential to comply with employment or other law. We will seek, however, to provide assurance upon closure of the investigation that appropriate action has been initiated in response to the complaint.

If the complaint relates to an allegation of ill treatment of a child, young person or adult at risk, then the LADO (local authority designated officer) is to be contacted immediately to discuss concerns and provide any available information. The LADO will advise on the appropriate course of action based on the seriousness of the allegation and the circumstances involved.

Where Little Gems ceases to use the services of a staff member, volunteer or contractor, dismisses because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, LADO may advise to make a referral to:

- The Secretary of State via the Teaching Regulation Agency (details of how to do so can be found on GOV.UK)
- The Disclosure and Barring Service (DBS) if the individual is dismissed or removed due to safeguarding concerns or would have been had they not resigned.

There are two sections covering the two levels of concerns and allegations:

1. Concerns / allegations that **may meet** the harm threshold.

This part of the guidance is about managing cases of concerns/allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college.

In this part of the guidance reference is made to 'allegation' for ease. This part of the guidance should be followed where it is alleged that anyone working in the school or a college that provides education for persons under 18 years of age, including supply teachers, volunteers and contractors has:

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

The last bullet point above includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk.

2. Concerns / allegations that **do not meet** the harm threshold – referred to 'low-level concerns'

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:
- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy • engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible

Children Missing out on Education

A child missing out on education is a child who is of compulsory school age, who is not registered at a school or is not receiving suitable education.

A child is not missing from education if they are:

- being Electively Home Educated (EHE)
- registered on a school roll and their whereabouts known, but not attending school

A child may become missing from education when:

- they failed to start in Reception Year at a school
- they did not transfer from one school to another. For example, when moved to / from another Local Authority area

- they failed to transfer into a secondary or middle school
- they have been permanently excluded from school
- they have failed to register in a school after travelling / living overseas
- their parent(s) are military personnel
- they are part of a travelling community

Little Gems policy for reporting Children Missing out on Education (CME)

Day 1: Unless notified by the school / parent / carer that a student is going to be absent, we will contact the school / parent / carer 15 minutes after the session start time. This will be done by phone call and then confirmed by email. We will then record on our academy system that the student is absent and record a note as to why they are absent **Student being out of education for 10 days or more:** When a student has been out of education for more than 10 days, as well as the above absent procedures, Little Gems will also contact the Local Authority CME team to make them aware of the absence.

Key points to remember for CME:

- **Information to provide:** When reporting, include the child's full name, date of birth, details of their current alternative provision, the date they last attended, and any known reasons for their absence.
- **Welfare concerns:** If we suspect that a child is at risk or being exploited, we will immediately contact children's social care and potentially the police alongside reporting to the CME LA team.

Policy confirmed by

Signed:

Name: Hayley James (Manager)

Date: 14 / 09 / 2026