



POLICY FOR SAFEGUARDING

ACROSS ALL DELIVERY STRANDS FROM FURTHER EDUCATION TO HIGHER
EDUCATION AND APPRENTICESHIP PROVISION

INCORPORATING CHILD PROTECTION

Updated August 2019

Background to the Policy Update

['Keeping Children Safe in Education'](#), DfE (2019)

THE FASHION RETAIL ACADEMY POLICY AND PROCEDURES FOR SAFEGUARDING INCORPORATING CHILD PROTECTION AND VULNERABLE ADULTS

Policy Consultation & Review

This policy is available on our website and is available on request from the curriculum office by emailing Curriculum@fra.ac.uk

We also inform parents and carers about this policy when their children join The Fashion Retail Academy in the Parent's guide for 19/20.

Students receive a detailed safeguarding induction during their time at The Fashion Retail Academy where internal and external safeguarding processes are outlined and the Policy is shared with them.

We recognise the expertise our staff offer by undertaking safeguarding training both online and face to face and managing safeguarding concerns on a daily basis and we therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements. Following the feedback from the board the proposed policy will be presented for staff consultation for a period of 2 weeks.

The policy is provided to all staff at induction alongside our Employee Handbook and the safeguarding response to those pupils who are missing from education.

In addition, all staff are provided with Part One of the statutory guidance '[Keeping Children Safe in Education](#)', DfE (2019). The Designated Safeguarding Officers also provide regular face to face updates on this policy.

This policy will be reviewed in full by the Governing Body on an annual basis. This policy was last reviewed and agreed by the Governing Body on 7 March 2017 It is due for review on [27 March 2019].

Signature

Principal

Date:

Signature

Chair of Governors

Date:

CONTENTS

Page:

	Purpose & Aims
	The Fashion Retail Academy Ethos
	Roles & Responsibilities
	Training & Induction
	Procedures for Managing Concerns
	Specific Safeguarding Issues
	Recording & Information Sharing
	Working with Parents & Carers
	Child Protection Conferences
	Safer Recruitment
	Safer Working Practice
	Managing Allegations against Staff
	Other relevant policies
	Statutory Framework

Appendices

1	Signs of Neglect
2	FASHION RETAIL ACADEMY Template – Safeguarding Concern Form

1. PURPOSE & AIMS

1.1 The purpose of The Fashion Retail Academy's safeguarding policy is to ensure every student is safe and protected from harm. This means we will always work to:

- Protect learners and young people at our academy from maltreatment;
- Prevent impairment of our young people's health or development;
- Ensure that young people at the Fashion Retail Academy learn in the provision of safe and effective care;
- Undertake that role to enable young people at the Fashion Retail Academy to have the best outcomes.

1.2 This policy will give clear direction to staff, visitor's parents or guardians about expected behaviour and our legal responsibility to safeguard and promote the welfare of all students at the Fashion Retail Academy.

1.3 The FASHION RETAIL ACADEMY fully recognises the contribution it can make to protect students from harm and supporting and promoting the welfare of all learners who are registered learners at the FASHION RETAIL ACADEMY. The elements of our policy are prevention, protection and support.

1.4 We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for students who are absent from The Fashion Retail Academy or who go missing from education, particularly on repeat occasions. The Student Services Manager will regularly liaise with the Designated Safeguarding Lead to discuss all persistently absent students and those who go missing to identify the risk of abuse and neglect including sexual abuse or exploitation and to ensure that appropriate safeguarding responses have been put in place to reduce the risk of future harm.

1.5 We will make sure that all learners and young people have the same protection regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation

1.6 This policy applies to all students, staff, parents, guardians, governors, and visitors.

1. OUR ETHOS

2.1 Student welfare is of paramount importance. The Fashion Retail Academy will establish and maintain an ethos where students feel secure, are encouraged to talk, are listened to and are safe. Students at the Fashion Retail Academy will be able to talk freely to any member of staff if they are worried or concerned about something.

2.2 Everyone who comes into contact with students and their families or guardians has a role to play in safeguarding FASHION RETAIL ACADEMY students. We recognise that staff at our academy play a particularly important role as they are in a position to identify concerns early and provide help for students to prevent concerns from escalating. All staff are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the welfare of a student, staff members must always act in the best interests of the student.

2.3 All staff will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a student and how to record and report this information. We will not make promises to students and we will not keep secrets. Every student will know the process staff follow after a safeguarding disclosure

2.4 Throughout our curriculum we will provide activities and opportunities for students to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage our students to develop essential life skills.

2.5 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018) and London and Country wide [safeguarding Children and Vulnerable Adults Board procedures](#).

2.6 As part of our responsibilities for safeguarding and promoting the welfare of students, we will provide a co-ordinated offer of early help when additional needs of students are identified. These may include if a student:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the student, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered learner.

3. ROLES AND RESPONSIBILITIES

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Anila Arshad-Mehmood	Anila.Arshad-Mehmood@fra.ac.uk 02073073180
Principal and CEO	Lee Lucas	Lee.lucas@fra.ac.uk
Named Safeguarding Governor	Elizabeth Rouse	Contact through Principals Office
Chair of Governors	Kim Longman	Contact through Principals Office

3.1 It is the responsibility of *every* member of staff and visitor to the Fashion Retail Academy to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of **all** of the students at the FASHION RETAIL ACADEMY. This includes the responsibility to provide a safe environment in which students can learn.

The Governing Body

3.2 The Governing Body of The Fashion Retail Academy is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Governing Body takes collective responsibility to safeguard and promote the welfare of our students, we also have a named governor who champions safeguarding within the FASHION RETAIL ACADEMY.

3.3 The Governing Body will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our website and has been written in line with Local Authority guidance and the requirements of the London Safeguarding Board and Vulnerable Adults policies and procedures
- The FASHION RETAIL ACADEMY contributes to inter-agency working in line with in line with Working Together to Safeguard Children (2018);
- A senior member of staff from leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL(s) who is appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role. The role will be evidenced explicitly in the role holder's job description.

- All staff receive a safeguarding induction and are provided with a copy of this policy, the staff code of conduct, the student code of conduct and the Fashion Retail Academy's safeguarding response for those students who go missing from education as detailed section 6 of this policy.
- All staff undertake appropriate child protection and vulnerable adult training that is updated annually.
- Procedures are in place for dealing with allegations against members of staff in line with statutory guidance;
- Safer recruitment practices are followed in accordance with the requirements of ['Keeping Children Safe in Education'](#) DfE (2019);

This policy includes detailed information on the procedures and processes to follow regarding peer on peer abuse, the recognition of it and the different forms it may take.

- They remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.

3.4 The governing body will receive a safeguarding report at each meeting that will record the training that has taken place, the number of staff attending and any outstanding training requirements. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual students.

The Principal

3.5 At the Fashion Retail Academy the Principal is responsible for:

- Identifying a senior member of staff from leadership team to be the Designated Safeguarding Lead (DSL);
- Identifying alternate members of staff to act as the Designated Safeguarding Lead (DSL) in his/her absence to ensure there is always cover for the role;
- Ensuring that the policies and procedures adopted by the governing body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff;
- Ensuring that all staff feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;
- Liaise with the LADO in the event of an allegation of abuse being made against a member of staff

The Designated Safeguarding Lead (DSL)

3.6 The Designated Safeguarding Lead is a senior member of staff, from the Leadership team who takes lead responsibility for safeguarding and child protection within the FASHION RETAIL ACADEMY. The DSL will carry out their role in accordance with the responsibilities outlined in Annex B of *'Keeping Children Safe in Education'*.

3.7 The DSL will provide advice and support to other staff on student welfare and child protection matters. Any concern for a student's safety or welfare will be recorded in writing and given to the DSL.

3.8 During term time the designated safeguarding lead and or a deputy will always be available (during college hours) for staff in the FASHION RETAIL ACADEMY to discuss any safeguarding concerns. If in *exceptional* circumstances, a DSL is not available on the FASHION RETAIL ACADEMY site in person, we will ensure that they are available via mobile telephone in line with the risk assessment for this.

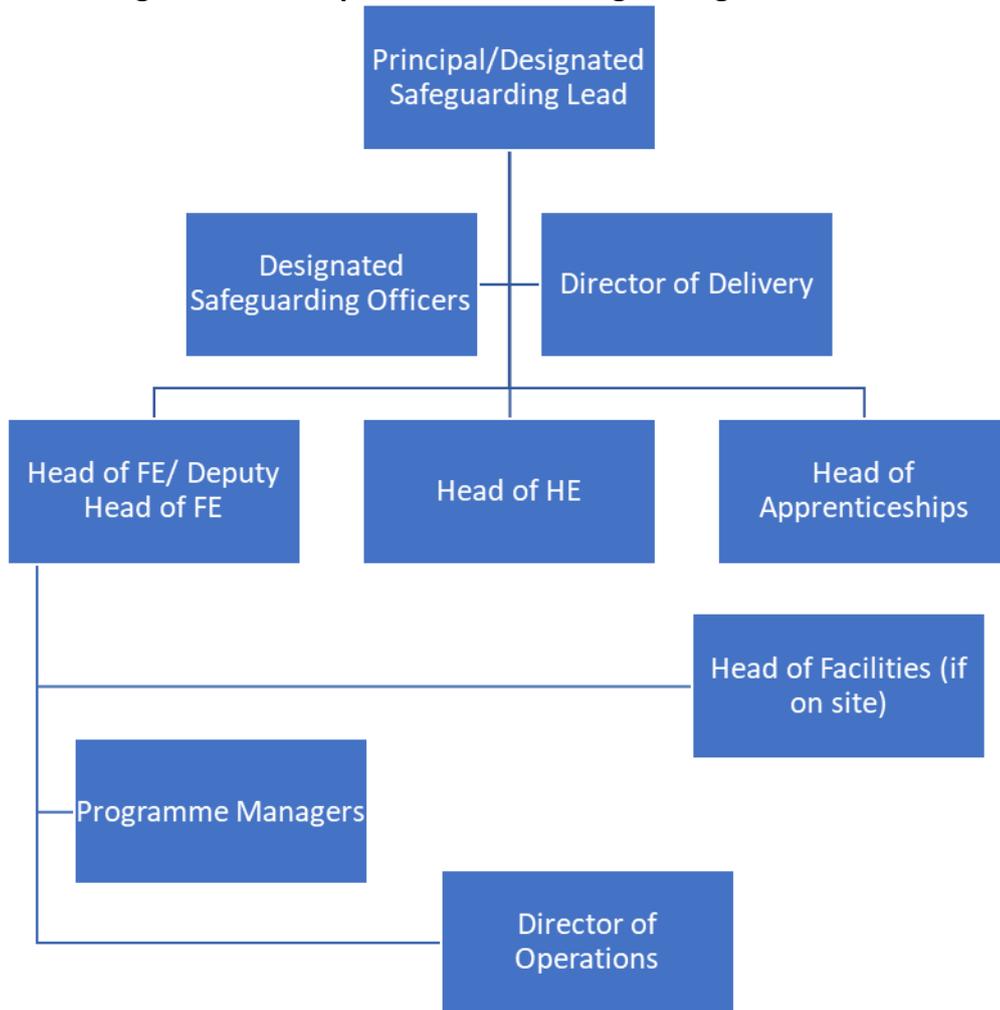
3.9 The DSL at The Fashion Retail Academy will represent the FASHION RETAIL ACADEMY at child protection conferences and core group meetings. Through appropriate training, knowledge and experience our DSL will liaise with Children's and Adult Services and other agencies where necessary, and make referrals of suspected abuse to Children's and Adult Services, take part in strategy discussions and other interagency meetings and contribute to the assessment of learners or adults.

3.10 The DSL will maintain written records and child protection files ensuring that they are kept confidential and stored securely.

3.11 The DSL is responsible for ensuring that all staff members are aware of our policy and the procedure they need to follow. They will ensure that all staff and contractors have received appropriate child protection and vulnerable adult information during induction and have completed Mandatory NSPCC Safeguarding Training.

3.12 The DSL will obtain and maintain details of the Local Authority Personal Advisor appointed to guide and support a student who is a care leaver where possible.

Decision Making Structure-Responsibilities for Safeguarding Decisions



4. TRAINING & INDUCTION

4.1 When new staff join they will be informed of the safeguarding arrangements in place. They will be given a copy of our safeguarding policy along with the staff handbook, Part one and Annex A of *'Keeping Children Safe in Education'* and told who our Designated Safeguarding Lead (DSL) and Deputy DSLs are. They will also receive a copy of the behaviour policy and the response to learners who go missing from education – this information is included in section 6 of this policy. All staff are expected to read these key documents. They will also be provided with the safeguarding recording form, given information on how to complete it and who to pass it to.

4.2 Every new member of staff or contractor will receive safeguarding training during their induction period the FASHION RETAIL ACADEMY. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a student, how to record, the processes for referral to Children's Services and Vulnerable Adults and the statutory assessments under Section 17 and Section 47 as well as the remit of the role of the Designated Safeguarding Lead (DSL). The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability to work with learners or vulnerable adults. Staff will also receive on-line safety training as this is part of the overarching safeguarding approach of the FASHION RETAIL ACADEMY.

4.3 In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of *'Keeping Children Safe in Education'*. In order to achieve this, we will ensure that:

- all members of staff will undertake appropriate safeguarding training on an annual basis and we will evaluate the impact of this training;
- all staff members receive regular safeguarding and child protection updates (for example, via email, training and meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard students effectively during routine CPD weeks.

4.4 All regular visitors and temporary staff will be given a set of our safeguarding procedures; they will be informed of whom our DSL and alternate staff members are and what the recording and reporting system is.

4.5 The DSL, the alternate designated member(s) of staff and any other senior member of staff who may be in a position of making referrals or attending child protection conferences or core groups will attend one of the multi-agency training courses organised by the Local Safeguarding Children's Board at least once every three years. The DSL and alternate will attend Designated Safeguarding Lead (DSL) training provided by the NSPCC every two years. In addition to formal training, DSL will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role. They are both members of the Contextual Safeguarding Network as advised by the Metropolitan

Police and undertake termly updating with a number of leading safeguarding agencies such as the Children's Society as well as their own professional development which is centrally logged with HR.

4.6 Our governing body will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all of the students at the FASHION RETAIL ACADEMY. Training for Governors to support them in their safeguarding role is available from the NSPCC.

4.7 We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance, Annex A of *'Keeping Children Safe in Education'* (2019) provides links to guidance on specific safeguarding issues such as Child Sexual Exploitation and Female Genital Mutilation. In addition, local guidance can be accessed via Local Safeguarding Board and within the Safeguarding Section of the website:

5. PROCEDURES FOR MANAGING CONCERNS

5.1 The Fashion Retail Academy adheres to child protection procedures that have been agreed locally through the London Safeguarding Board (LSB). Where we identify students in need of support, we will carry out our responsibilities in guidance with LSB or the student's local authority safeguarding service.

5.2 Every member of staff at the Fashion Retail Academy are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the welfare of a student, staff members should always act in the interests of the learner and have a responsibility to act as outlined in this policy.

5.3 All staff are encouraged to report any concerns that they have, and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy immediately to allow the DSL to build up a picture and access support for the learner at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

5.4 It is *not* the responsibility of FASHION RETAIL ACADEMY staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

5.5 The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in the FASHION RETAIL ACADEMY. Any member of staff or visitor to the FASHION RETAIL ACADEMY who receives a disclosure of abuse or suspects that a student is at risk of harm must report it immediately to the DSL or, if unavailable, to the alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

5.6 All concerns about a learner or young person should be reported without delay and recorded in writing using the agreed template (see Appendix 1).

5.7 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's or Vulnerable Adult Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

5.8 Work Placement:

During work placement off-site The Fashion Retail Academy asks all retailers to ensure they pass on any concerns or relevant information that may indicate a safeguarding need. The safeguarding policy is available to all retailers and further

training sessions are organised annually and offered to the team to further support their understanding of how to support learners. All learners are covered under their employer's liability insurance and are encouraged to make their HR contact aware of any areas of concern. This will then in turn be passed back to The Fashion Retail Academy and as relevant the Designated Safeguarding Lead. It is not the responsibility of the retailer to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

5.9 Apprentices:

Safeguarding Apprentices in the Workplace

Apprentices need to be safeguarded against the same range of risks and dangers as their peers in schools and colleges. Due to their relative inexperience in the workplace, in some cases, apprentices may be particularly vulnerable to anxiety or struggle to cope with the transition. Systems can help staff recognise this and offer suitable support to those who need it. The Fashion Retail Academy has therefore put processes in place to protect our apprentices.

From academic year 2019/20, The Fashion Retail Academy will advise employers to do the following:

Familiarise themselves with relevant government legislation and take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibilities they have for the people they employ.

<< www.acas.org.uk
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard_Children.pdf>>

- Ensure that any staff working with apprentices in a position of trust are appropriate for the role and do not present any danger or threat.
- Ensure apprentices are made aware of your organisation's policies on using the internet and technology in the workplace.
- Understand the dangers apprentices may face using technology in the workplace and act to minimise risks.

This policy is also designed to protect employers and provide a procedure to report or raise any concerns they may have. If employers have any safeguarding concerns

regarding a Fashion Retail Academy apprentice, they can contact the safeguarding lead at the Fashion Retail Academy in the first instance.

5.10 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's or Vulnerable Adult Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

5.11 All referrals will be made in line with the Local Safeguarding Board for London vulnerable adult procedures as outlined in Appendix 3.

5.12 If, at any point, there is a risk of immediate serious harm to a student a referral should be made to Children's or Vulnerable Adult Services immediately. Anybody can make a referral in these circumstances. If the student's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Principal. Concerns should always lead to help for the student at some point.

5.13 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's and Vulnerable Adult Services, or the police if:

- the situation is an emergency and the designated senior person, their alternate and the Principal are all unavailable;
- they are convinced that a direct report is the only way to ensure the student's safety.

5.13 Any member of staff who does not feel that concerns about a student have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Principal or the Chair of Governors.

6. Specific Safeguarding Issues

Contextual safeguarding

6.1 At the Fashion Retail Academy we recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the FASHION RETAIL ACADEMY environment and/or can occur between individuals outside of the FASHION RETAIL ACADEMY. This is known as contextual safeguarding. It is key that all FASHION RETAIL ACADEMY staff are aware of the definition of contextual safeguarding and when reporting concerns, they include as much information and background detail as possible so the DSL can make a referral with a holistic view of the student. This will allow any assessment to consider all the available evidence and the full context of any abuse.

6.2 We recognise that students with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration;
- learners with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

6.3 At The Fashion Retail Academy we recognise that a previously looked after learner potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these students, who are a particularly vulnerable group.

So-called 'Honour-abuse'

6.4 At The Fashion Retail Academy we recognise that our staff are well placed to identify concerns and act to prevent students from becoming victims of Female Genital Mutilation (FGM), and other forms of so-called 'honour-based' violence (HBV) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a student that might be at risk of HBV they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

6.5 Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. 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 teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be

found in the following Home Office guidance: [Mandatory Reporting of Female Genital Mutilation- procedural information](#) Home Office (December 2015)

Preventing radicalisation and extremism

6.6 We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. At The Fashion Retail Academy, we will ensure that:

- Thorough training, staff, and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in the FASHION RETAIL ACADEMY and how to respond when concerns arise.
- There are systems in place for keeping students safe from extremist material when accessing the internet in our academy by using effective filtering and usage policies.
- The DSL has received Prevent training and will act as the point of contact within our academy for any concerns relating to radicalisation and extremism.
- The DSL will make referrals in accordance with London Channel Procedures and will represent the FASHION RETAIL ACADEMY at Channel meetings as required.
- Through our curriculum, we will promote the moral, social and cultural development of students

Peer on peer abuse

6.7 We recognise that students are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important that all staff to remember the impact on both the victim of the abuse as well as to focus on the support for the learner or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same [safeguarding children procedures](#) will apply in respect of any learner who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to peer on peer abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.

6.8 At The Fashion Retail Academy all staff are trained so that they are aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

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

6.9 All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about peer on peer abuse. The DSL will respond to any concerns related to peer on peer abuse in line with guidance outlined in Part five of 'Keeping Children Safe in Education' and ['Sexual violence and sexual](#)

[harassment between children in schools and colleges'](#) (May 2018). We will ensure that all concerns, discussions and decisions reached are clearly recorded and any identified actions are followed up.

6.10 We will work with other agencies as required to respond to concerns about sexual violence and harassment. We will seek consultations where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour from the Harmful Sexual Behaviour (HSB) Team as required so that we ensure we are offering the right support to the learners. Support will depend on the circumstances of each case and the needs of the learner, it may include completion of risk assessments to support learners to remain in education whilst safeguarding other learner and the victim, delivery of early intervention in respect of HSB and/or referral to (LARC) where a student discloses a rape, an attempted rape or a serious sexual assault whether this has happened recently or in the past.

Safeguarding responses to learners who go missing

6.11 At The Fashion Retail Academy all staff should be aware of the safeguarding responsibilities for students who are missing education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.

6.12 At The Fashion Retail Academy we adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to students who are missing:

- An attendance register is taken for every timetabled session
- We make every effort to contact parents and carers and follow up with the emergency contacts held;
- We hold at least two emergency contact numbers for each of the students on our roll wherever possible.
- Staff will alert DSLs to any concerns raised regarding students who are absent from the FASHION RETAIL ACADEMY
- The DSLs will meet regularly with the Student Services Manager, SENCO and other members of the pastoral team to ensure that each response is thorough and takes into account all the relevant information about individual learners;
- We will follow the procedures outlined in our attendance monitoring process including undertaking first day calling and monitoring data to ensure we intervene early in cases of poor attendance and/or unexplained absences.
- When removing a student from roll we will inform the Local Authority in accordance with statutory requirements and pass on all safeguarding files.

7. RECORDS AND INFORMATION SHARING

7.1 If staff are concerned about the welfare or safety of any student at the FASHION RETAIL ACADEMY they will record their concern on the agreed reporting form (Appendix 1). They should ensure that the form is signed and dated. Any concerns should be passed to the DSL without delay.

7.2 Any information recorded will be kept in a separate named file, in a secure cabinet and not with the students' academic file. These files will be the responsibility of the DSL. Child protection information will only be shared within the FASHION RETAIL ACADEMY on the basis of 'need to know in the student's interests' and on the understanding that it remains strictly confidential.

7.3 Child protection information will only be kept in the safeguarding drive and this file will be kept up to date. Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored here. All our safeguarding files will include; a chronology, contents front cover and will record significant events in the learner's life. No paper copies will be kept unless absolutely required.

7.4 When a student leaves the FASHION RETAIL ACADEMY the DSL will make contact with the DSL at the new education setting and will ensure that the child protection file is forwarded to the receiving setting in an appropriately agreed manner. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving setting and/or evidence of recorded delivery. Where a parent elects to remove their child from the FASHION RETAIL ACADEMY to home educate, we will make arrangements to pass any safeguarding concerns to the Services to Home Educators Team within London Safeguarding Board.

8. WORKING WITH PARENTS & CARERS

8.1 The Fashion Retail Academy is committed to working in partnership with parents/carers to safeguard and promote the welfare of students and to support them to understand our statutory responsibilities in this area.

8.2 When students join the FASHION RETAIL ACADEMY parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to Children's Services.

8.3 We are committed to working with parents and guardians positively, openly and honestly. We ensure that all parents and guardians are treated with respect, dignity and courtesy. We respect parents' and guardians' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a student from harm.

8.4 We will seek to share with parents or guardians any concerns we may have about their learner *unless* to do so may place a learner at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the FASHION RETAIL ACADEMY has about a student will not prevent the DSL making a referral to Children's Services in those circumstances where it is appropriate to do so.

8.5 In order to keep students safe and provide appropriate care for them, the FASHION RETAIL ACADEMY requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all persons with parental responsibility
Emergency contact details (if different from above);
- Full details of any other adult authorised by the parent or guardian to collect the student from the FASHION RETAIL ACADEMY (if different from the above).

The FASHION RETAIL ACADEMY will retain this information on the student's file. The FASHION RETAIL ACADEMY will only share information about students with adults who have parental responsibility for a student or where a parent has given permission and the FASHION RETAIL ACADEMY has been supplied with the adult's full details in writing.

9. CHILD PROTECTION CONFERENCES

9.1 Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a Child Protection Plan in order to monitor the safety of the child and the required reduction in risk.

9.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the Fashion Retail Academy in respect of individual learners. Usually the person representing the academy at these meetings will be the DSL. In any event, the person attending will need to have as much relevant up to date information about the learner as possible; any member of staff may be required to contribute to this process.

9.3 All reports for child protection conferences will be prepared in advance using the guidance and template provided by the LSCB. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the learner's physical, emotional and intellectual development and the learner's presentation at the FASHION RETAIL ACADEMY. In order to complete such reports, all relevant information will be sought from staff working with the student.

9.4 Clearly child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose learner has been referred to Children's Services or whose learner is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all learners and our aim is to achieve this in partnership with our parents.

10. SAFER RECRUITMENT

10.1 We will ensure that the Principal and at least one member of the Governing Body have completed appropriate safer recruitment training. At all times the Principal and Governing Body will ensure that safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'*, DfE (2019). At least one person involved in conducting an interview will have received safer recruitment training or will have been updated on safer recruitment by someone who has completed the training.

10.2 At the Fashion Retail Academy we will use the recruitment and selection process to deter and reject unsuitable candidates. We require evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. We will question the contents of application forms if we are unclear about them, we will undertake Disclosure and Barring Service checks and use any other means of ensuring we are recruiting and selecting the most suitable people to work with our students.

10.3 We will maintain a Single Central Register (SCR) of all safer recruitment checks carried out in line with statutory requirements. A senior member of staff will check the SCR regularly to ensure that it meets statutory requirements.

11. SAFER WORKING PRACTICE

11.1 All individuals who come into contact with our students have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our students are competent, confident and safe to do so.

11.2 All staff will be provided with a copy of our staff code of conduct at induction. They will be expected to know our staff Code of Conduct and policy for positive handling and carry out their duties in accordance with this advice. There will be occasion when some form of physical contact is inevitable, for example if a learner has an accident or is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed policy for safe restraint must be adhered to. A list of staff that have accessed London Steps training will be kept by the Principal.

11.3 If staff are working with students alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in the FASHION RETAIL ACADEMY, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

11.4 Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with learners. This advice can be found in ['Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings'](#) (October 2015). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

12 Managing Allegations against Staff

12.1 Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for all students at the FASHION RETAIL ACADEMY.

12.2 We will take all possible steps to safeguard our learners and to ensure that the adults who work at the FASHION RETAIL ACADEMY are safe to work with students. We will always ensure that the procedures outlined in [London Safeguarding Children Board Protocol: Allegations Against Persons who Work with Children](#) and Part 4 of 'Keeping Children Safe in Education', DfE (2019) are adhered to and will seek appropriate advice. This process will be followed should the allegation be made about the Principal.

12.3 If an allegation is made or information is received about any adult who works in our setting which indicates that they may be unsuitable to work with students, the member of staff receiving the information should inform the Principal immediately. This includes concerns relating to agency and supply staff. Should an allegation be made against the Principal, this will be reported to the Chair of Governors. In the event that neither the Principal nor Chair of Governors is not contactable on that day, the information must be passed to and dealt with by either of the FASHION RETAIL ACADEMY Directors.

12.4 The Principal or Chair of Governors will seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

12.5 The Fashion Retail Academy has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a student, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at the Fashion Retail Academy, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

12.6 The Head of HR will contact the Secretary of State in accordance to the Education 2002 Act.

13 RELEVANT POLICIES

13.1 To underpin the values and ethos of The Fashion Retail Academy and our intent to ensure that students are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- **Staff Code of Conduct**
- **Safer Recruitment & Selection**
- **On-line Safety**
- **Health and Safety**
- **First Aid**
- **CCTV Policy**
- **Lockdown Policy**
- **Preventing Extremism and Radicalisation Safeguarding Policy**

14. STATUTORY FRAMEWORK

This policy has been devised in accordance with the following legislation and guidance:

- [‘Working Together to Safeguard Children’](#) DfE (July 2018)
- [‘Keeping Children Safe in Education’](#) DfE (2019)
- Local Safeguarding Procedures
- <https://www.londonscb.gov.uk/procedures/>
- Local Safeguarding Board Protocol: Allegations Against Persons who work with children
- <https://www.rbkc.gov.uk/lscb/information-professionals-and-volunteers/lado-managing-allegations>
- [Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings](#) (October 2015).
- [‘What to do if you're worried a child is being abused’](#), DfE (March 2015)
- [Information sharing: advice for practitioners providing safeguarding services](#), DfE (July 2018)
- [‘The Prevent duty: Departmental advice for schools and childcare providers’](#), DfE (June 2015)
- [Mandatory Reporting of Female Genital Mutilation- procedural information](#) Home Office (December 2015)
- [Sexual violence and sexual harassment between children in schools and colleges’](#), DfE (May 2018)
- Shared services Violence Against Women and Girls (VAWG) Strategy 2015-2018
https://www.rbkc.gov.uk/lscb/sites/default/files/atoms/files/VAWG_Strategy2015_0.pdf

Appendix 1

What is abuse and neglect?

A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children & young people may be abused in a family, institutional or community setting; by those known to them or, more rarely, by a stranger.

Physical abuse: may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a learner, including by fabricating the symptoms of, or deliberately causing, ill health.

Emotional abuse: persistent emotional ill-treatment of a learner such as to cause severe and persistent adverse effects on the learner's emotional development. It may involve conveying to learner that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person, age or developmentally inappropriate expectations being imposed on learners, causing learners frequently to feel frightened, or the exploitation or corruption of learners.

Sexual abuse: involves forcing or enticing a learner or young person to take part in sexual activities, whether or not the learner is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include involving learner in looking at, or in the production of, pornographic material, or encouraging learners to behave in sexually inappropriate ways.

Neglect: persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in the serious impairment of the learner's health or development, such as failing to provide adequate food, shelter & clothing, or neglect of, or unresponsiveness to, a learner's basic emotional need

Peer on Peer Abuse: any of the above forms of abuse, cyber-abuse, bullying between young people.

<https://www.rbkc.gov.uk/lscb/information-professionals-and-volunteers/what-abuse-and-neglect>

Appendix 2

FASHION RETAIL ACADEMY Safeguarding Form

Safeguarding Concern Report Form

Please report your concerns directly and send the completed form to a **Designated Safeguarding Officer** before the end of the working day:

- Anila Arshad –Mehmood Student Services and Wellbeing Manager
- Please complete clearly and factually.

Name of staff member reporting			
Position			

Name of student who is of concern			
Course & Group		DOB	

Is this concern arising from (indicate as appropriate)	
Observation by yourself	
Disclosure by the student of concern	
Disclosure by somebody else	

Does the concern involve a member of FRA staff? If yes, please give their name and role.	
--	--

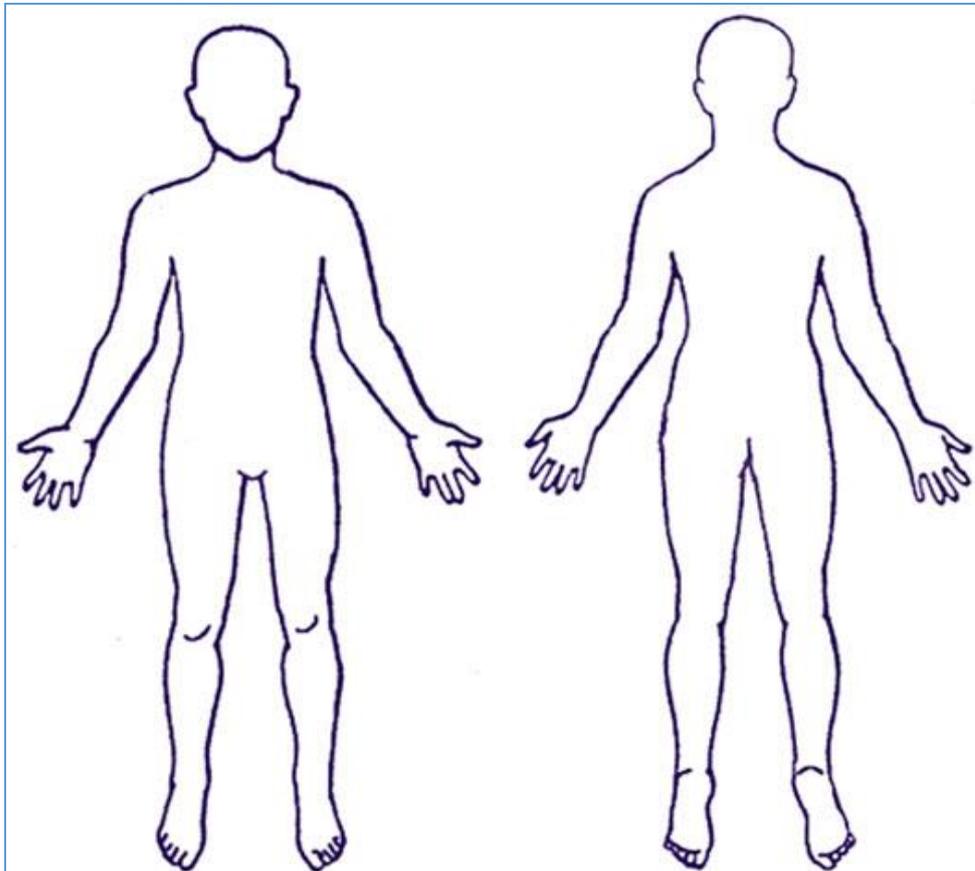
Date & time of observation or disclosure:	
Factual details of observation or disclosure (<i>expand document as required</i>) [<i>include date and date as appropriate</i>]	
<i>NB: Please use the 'Body Map' over the page to record location of any injuries</i>	
Any action already taken by you/others/student (<i>expand document as required</i>)	
Date/Time reported to Safeguarding Officer:	
Signature	

Good Practice checklist

- Make sure the subject is safe

- Never promise complete confidentiality. Be clear that you have a duty to report anything that you consider is evidence that someone is at risk, whether that be a student, a member of their family, or another third person
- In the case of a disclosure, assure the subject that they will be taken seriously and reassure them
- Record the facts of the observation/disclosure and clearly mark any statements of opinion. Do not make judgements, you only need to report.
- In case of injury, seek medical treatment if it is required urgently, but be conscious of not disturbing or destroying potential evidence
- If a crime has been committed, check whether the police have been contacted
- Do not discuss your report with anyone, particularly any alleged perpetrator
- Report to a Designated Safeguarding Officer, directly, not by email, by the end of the working day

Body Map - Front and Back Views



Appendix 3:

Safeguarding for guests of the FASHION RETAIL ACADEMY:

Welcome to The Fashion Retail Academy. To help facilitate your time with us we ask that you read and review our safeguarding policy, this has been summarised briefly in this handout to help you understand the key points.

The purpose of The Fashion Retail Academy's safeguarding policy is to ensure every student is safe and protected from harm. This means we will always work to:

- Protect learners and young people at our academy from maltreatment;
- Prevent impairment of our young people's health or development;
- Ensure that young people at the FASHION RETAIL ACADEMY learn in the provision of safe and effective care;
- Undertake that role so as to enable young people at the FASHION RETAIL ACADEMY to have the best outcomes.

This policy applies to all students, staff, parents, guardians, governors, and visitors.

OUR ETHOS

Student welfare is of paramount importance. The Fashion Retail Academy will establish and maintain an ethos where students feel secure, are encouraged to talk, are listened to and are safe. Students at the Fashion Retail Academy will be able to talk freely to any member of staff if they are worried or concerned about something.

Everyone who comes into contact with students and their families or guardians has a role to play in safeguarding FASHION RETAIL ACADEMY students. We recognise that staff at our academy play a particularly important role as they are in a position to identify concerns early and provide help for students to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a student, staff members must always act in the best interests of the student.

We will not make promises to any student and we will not keep secrets. Every student will know the process staff will follow after a safeguarding disclosure

At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018) and London and Country wide [safeguarding Children and Vulnerable Adults Board procedures](#).

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Anila Arshad-Mehmood	Anila.Arshad-Mehmood@fra.ac.uk 02073073180
Principal and CEO	Lee Lucas	Lee.lucas@fra.ac.uk

PROCEDURES FOR MANAGING CONCERNS

All staff are encouraged to report any concerns that they have, and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy immediately to allow the DSL to build up a picture and access support for the learner at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in the FASHION RETAIL ACADEMY. Any member of staff or visitor to the FASHION RETAIL ACADEMY who receives a disclosure of abuse or suspects that a student is at risk of harm must report it immediately to the DSL or, if unavailable, to the alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

All concerns about a learner or young person should be reported without delay and recorded in writing using the agreed template (see Appendix 1).

If, at any point, there is a risk of immediate serious harm to a student a referral should be made to Children's or Vulnerable Adult Services immediately. Anybody can make a referral in these circumstances after first making efforts to contact the DSL or Principal.

Please see the full policy for further guidance or approach the DSL for further training.

Appendix 4:

New Staff intro handout:

What is a child:

In England, Northern Ireland and Wales, a child is someone who **not yet reached** their 18th birthday. Once they turn 18 they are legally an adult.

What is safeguarding:

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.

Safeguarding means:

- protecting children from abuse and maltreatment
- preventing harm to children's health or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

What is abuse:

Child **abuse** is when a child is intentionally harmed by an adult or another child – it can be over a period of time but can also be a one-off action. It can be physical, sexual or emotional and it can happen in person or online. It can also be a lack of love, care and attention – this is neglect.

Spotting the signs:

Some **common signs** that there may be something concerning happening in a learner's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body.

These signs don't necessarily mean that a learner is being abused, there could be other things happening in their life which are affecting their behaviour – but we can help you to assess the situation.

You may also notice some concerning behaviour from adults who you know have learners in their care, which makes you concerned for the learners safety and wellbeing.