



**MANOR**  
MULTI ACADEMY TRUST

# **Child protection and safeguarding Policy**

Manor Multi Academy Trust

St Albans Academy



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## Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
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Deputy DSLs	Hannah Abbiss Sarah Headland	habbiss@stalbansceacademy.com sheadland@stalbansceacademy.com
Local authority designated officer (LADO)	Kenny Edgar	Kenny.Edgar@wolverhampton.gov.uk 01902 550477
Data Protection Officer	Neil Beards	nbeards@manormat.com 01902 556460
Wolverhampton safeguarding Lead	Multi Agency safeguarding Hub	MASH@wolverhampton.gov.uk Partnership 01902 55392 / 01902 552999 (Emergency Duty Team)
Local Authority Prevent Lead	James Somers	James.Somers@wolverhampton.gov.uk
Police Prevent Lead	Deborah Smith	Deborah.Smith@wolverhampton.gov.uk
Early Help Team		01902 551979
NSPCC		help@nspcc.org.uk 0121 200 4600
Channel helpline		020 7340 7264
Chair of Governors	David Coles	dcoles@manormat.com

## 1. Aims

In all Manor MAT schools we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment in line with the Department for Education (DfE) statutory guidance *Keeping Children Safe in Education (2022)* and *Working Together to Safeguard Children (2018)*.

All stakeholders in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interests of the child.

The school aims to ensure that:

- › Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- › All staff are aware of their statutory responsibilities with respect to safeguarding
- › Staff are properly trained in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- › Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- › [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- › Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular

disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- › The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- › This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)
- › This policy also complies with our funding agreement and articles of association.

### 3. Definitions

"**Safeguarding**" is a wider all arching Rainbow. **Safeguarding** is Government agenda of keeping children safe – e.g. traffic calming measures outside schools, restricting sale of fireworks to under 16 year olds. "Child Protection" is a small segment of that rainbow.

**Child Protection** is the process and framework that protects specific children. In practice, **Safeguarding** is the policies and practices that schools and Governing Bodies employ to keep children safe and promote their well-being. **Child Protection** is a term used to describe the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm. Safeguarding and promoting the welfare of children is defined by the DfE as:

- Protecting 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 outcome.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

**Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make

arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA

## 4. Making a Referral Our Local Arrangements

The designated safeguarding lead and any deputies should liaise with the three safeguarding partners

1. local authorities
2. chief officers of police, and
3. clinical commissioning groups)

All schools in Manor Multi-Academy Trust work together with relevant agencies (as they consider appropriate) to safeguard and protect the welfare of children in the area and work with other agencies in line with Working Together to safeguard children. Multi-agency working Schools and Academies in Manor Multi-Academy Trust have a pivotal role to play in multi-agency safeguarding arrangements. Manor Board of Directors ensure that the schools in Manor MAT contribute to multi-agency working in line with statutory guidance Working Together to Safeguard Children. New safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of children, including identifying and responding to their needs. The DSL and DDSL at our school has received full Level 3: Child Protection and Safeguarding Training; Safer Recruitment Training, Working Together from Wolverhampton's Safeguarding partners. All staff receive annual safeguarding training as well as regular internal training offered at each school in line with new legislation and government guidance.

- The designated safeguarding lead and any deputies liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.
- NPCC- When to call the police should help designated safeguarding

The school's safeguarding leads understand when they should consider calling the police and what to expect when

### **CONTACTING THE POLICE In an emergency dial 999.**

This should be used if: There is a danger to life or Risk of serious injury or a serious crime is in progress or about to happen.

For example:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment
- Sexual offences
- Theft
- Weapons

Any member of staff witnessing such an incident should be empowered to dial 999 as they will be able to give the most accurate account of the incident. When an incident occurs in which a crime has or may have been committed, the school will consider whether to involve the police. Many incidents can be dealt with and resolved internally. The school's behaviour policy contains guidance on how to deal with and record such incidents.

## **OPERATION ENCOMPASS**

Operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day.

This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

## **CLINICAL COMMISSIONING GROUPS**

Clinical commissioning groups are one of the three statutory safeguarding partners. NHS Health practitioners are in a strong position to identify welfare needs or safeguarding concerns regarding individual children and, where appropriate, provide support. This includes understanding risk factors, communicating and sharing information effectively with children and families, liaising with other organisations and agencies, assessing needs and capacity, responding to those needs and contributing to multi-agency assessments and reviews.

A wide range of health practitioners have a critical role to play in safeguarding and promoting the welfare of children including: GPs, primary care practitioners, paediatricians, nurses, health visitors, midwives, school nurses, allied health practitioners, those working in maternity, child and adolescent mental health, youth custody establishments, adult mental health, sexual, alcohol and drug services for both adults and children, unscheduled and emergency care settings, highly specialised services and secondary and tertiary care.

The children of our school will receive regular health checks and visits by the school nurse to ensure their development is supported. The school nurse will also attend various meetings to support children and families, including: Early Help Assessments and Child Protection Conferences and Core Group meetings. The school holds half termly meetings with the school nurse to discuss the development and welfare of the children. The will also contact the school nurse regarding non-urgent medical inquiries.

## **4. Equality statement**

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- › Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- › Are young carers
- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- › Have English as an additional language
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- › Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member's mental health needs
- › Are looked after or previously looked after (see section 12)
- › Are missing from education
- › Whose parent/carer has expressed an intention to remove them from school to be home educated

## 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- › Behaviour policy
- › Pastoral support system
- › Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

### 5.1 All staff

All our staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE).

All our Staff who work directly with children are also expected to read annex B of KCSIE (about specific safeguarding issues), but you may expect all of your staff, including those who don't work directly with children, to read it too. Amend the sentence below, as necessary, to reflect your approach.

All staff will:

- › Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- › Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- › Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- › Provide a safe space for pupils who are LGBT to speak out and share their concerns

All staff will be aware of:

- › Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct] the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety policy] and the safeguarding response to children who go missing from education
- › The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment



- › The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- › What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- › The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- › The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- › The fact that children can be at risk of harm inside and outside of their home, at school and online
- › The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- › What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

## **5.2 The designated safeguarding lead (DSL)**

The DSL is a member of the senior leadership team. Our DSL is Joanne Robinson (Head of School). The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The DSL can be contacted out of school hours if necessary by emailing [jrobinson@stalbansceacademy.com](mailto:jrobinson@stalbansceacademy.com) phone.

When the DSL is absent, the deputies – Hannah Abbiss (Deputy Headteacher) or Sarah Headland (Family Support Worker) – will act as cover.

If the DSL and deputies are not available, Matthew Wynne (MAT Associate Headteacher) will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:

- › Provide advice and support to other staff on child welfare and child protection matters
- › Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- › Contribute to the assessment of children
- › Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- › Have a good understanding of harmful sexual behaviour

The DSL will also:

- › Keep the headteacher informed of any issues
- › Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- › Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- › Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

- › Be aware that children must have an ‘appropriate adult’ to support and help them in the case of a police investigation or search

### 5.3 The governing board

The governing board will:

- › Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- › Evaluate and approve this policy annually, ensuring it complies with the law, and hold the headteacher to account for its implementation
- › Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school’s local multi-agency safeguarding arrangements
- › Appoint a safeguarding link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- › Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the ‘case manager’ in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

### 5.4 The headteacher/ Head of School

The headteacher/ Head of school is responsible for the implementation of this policy, including:

- › Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- › Communicating this policy to parents/carers when their child joins the school and via the school website
- › Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- › Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- › Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- › Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- › Ensuring the relevant staffing ratios are met, where applicable

## 5.5 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

## 6. Confidentiality

We recognise that all matters relating to child protection are confidential.

The Headteacher (DSL) or Deputy Headteacher will disclose any information about a child to other members of staff on a need to know basis only.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with Multi Agency Support Hub (MASH)

### GDPR

Manor MAT's Data Protection Officer (DPO) has a due regard to the relevant data protection principles, which allows all schools in Manor MAT to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- › Being confident in the school's processing conditions which allow Manor Primary School to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- › Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- › Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

## 7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

### 7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

All staff should be aware of the process for making referrals to children’s social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

Any discussion about a child’s welfare should be recorded in writing, including a note of the date and who took part in the discussion. At the close of a discussion, there should be clear and explicit agreement about who will be taking what action, or that no further action will be taken. This agreement should also be recorded in writing.

Such discussion should never delay emergency action to protect a child. Anyone believing that a child is suffering or is at risk of suffering significant harm must make a referral to the DSL as soon as possible. **Under no circumstances should any essential emergency action to safeguard a child or urgent medical treatment be delayed**

<https://www.gov.uk/report-child-abuse-to-local-council>

### 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

### **7.3 If you discover that FGM has taken place or a pupil is at risk of FGM**

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

### **7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

#### **Early help assessment**

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Procedures for Early Help assessments.

The primary aim of the school's Early Help systems is to try to intervene early with families before it gets to the stage when a child may be at risk of harm. The school will aim to work with families in a supportive, non-judgmental way so that trust is built up and the best possible outcomes achieved.

Following the identification of a family who may require Early Help the school will seek to gain consent from the family to engage with the services who may be best placed to support them e.g. health, social services, police, Educational Psychologists and outreach services. This will most likely involve support from the Local Early Help support team who will work with the school to assess the needs of the family and to complete an initial assessment.

The levels of needs for each family is assessed on an individual basis and different levels of services can be accessed as a result. The decision to carry out the assessment is taken jointly with the relevant staff and a member of the SLT or Safeguarding team, the pupil (where appropriate) and parent/carers.

The lead Early Help Practitioner will develop an Early Help Record with the family, with consent, as a tool for understanding strengths and needs, establishing goals and record the work undertaken by all practitioners in partnership with the family.

The lead Early Help Practitioner will also be responsible for drawing all agencies who are named in the Early Help Record to support the family.

The Early Help process will continue until the case is closed or escalated to higher level of need.

## **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

## **Multi-Agency Safeguarding Referral Hub (MASH)**

Everyone has a responsibility for the protection of children and there is a duty placed on all those working with children and families to report concerns. This is not a matter for individual choice. All schools must have clear in-house procedures which describe what should happen if anyone has concerns for the welfare of a child and all staff must abide by those procedures. MULTI AGENCY SAFEGUARDING HUB (MASH) The Multi Agency Safeguarding Hub (MASH) – full contact details on above - is the single point of contact for all early help and safeguarding concerns regarding children and young people in Wolverhampton. It brings together expert professionals, from a range of services that have contact with children, young people and families, making the best possible use of their combined knowledge and information to meet children's needs and keep them safe from harm. MASH:

- Is a 'front door' to manage early help and safeguarding referrals;
- Provides a secure and confidential environment for professionals to share information;
- Enables early identification of potential safeguarding concerns and facilitates access to timely and effective interventions;
- Prioritises referrals using Red, Amber & Green (RAG) rating;

- Makes sure that cases that don't meet the Threshold for Children's Social Care are picked up by other agencies as Early Help or other appropriate support;
- Where necessary, activates 'immediate response' social work services to provide protection for a 2 child or young person(s).

When a referral is made to MASH - Early Help and Social Care staff in the MASH will carry out a range of information checks to see what if any additional information there is in partners' files to ensure the best possible picture of the family is used to inform decisions about keeping children safe and the sort of help and support the family might need, including children with: health conditions, a mental health need, a family member in prison or affected by parental offending, a risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage, and persistent absence from education (including absences for part of the day).

Once a telephone referral is made, the DSL/DDSL (or staff/student/volunteer) making the referral must fill out and return a completed MULTI-AGENCY REFERRAL FORM (MARF) to the MASH within 24 hours. The completed form should then be sent to:

- MASH@wolverhampton.gov.uk or
- MASH@wolverhampton.gcsx.gov.uk (secure email) or
- posted to: The Multi-Agency Safeguarding Referral Hub (MASH), Civic Centre, St Peters Square, Wolverhampton, WV1 1RT.

The better the information you put on the MARF, the more likely it is that the staff in the MASH will be able to make an accurate, safe and swift decision about how best to manage any risks and help both the child(ren) and their family. The written referral should be acknowledged by the MASH within three working days of receipt of the initial contact indicating the actions to be taken.

## 7.5 If you have concerns about extremism

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

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

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

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

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

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

## 7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Manor Multi-Academy Trust has employed an Educational Psychologist who can diagnose a mental health problem. Staff also receive annual mental health training and are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this child protection policy and speaking to the designated safeguarding lead or a deputy. The department has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See 'Rise Above' for links to all materials and lesson plans. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

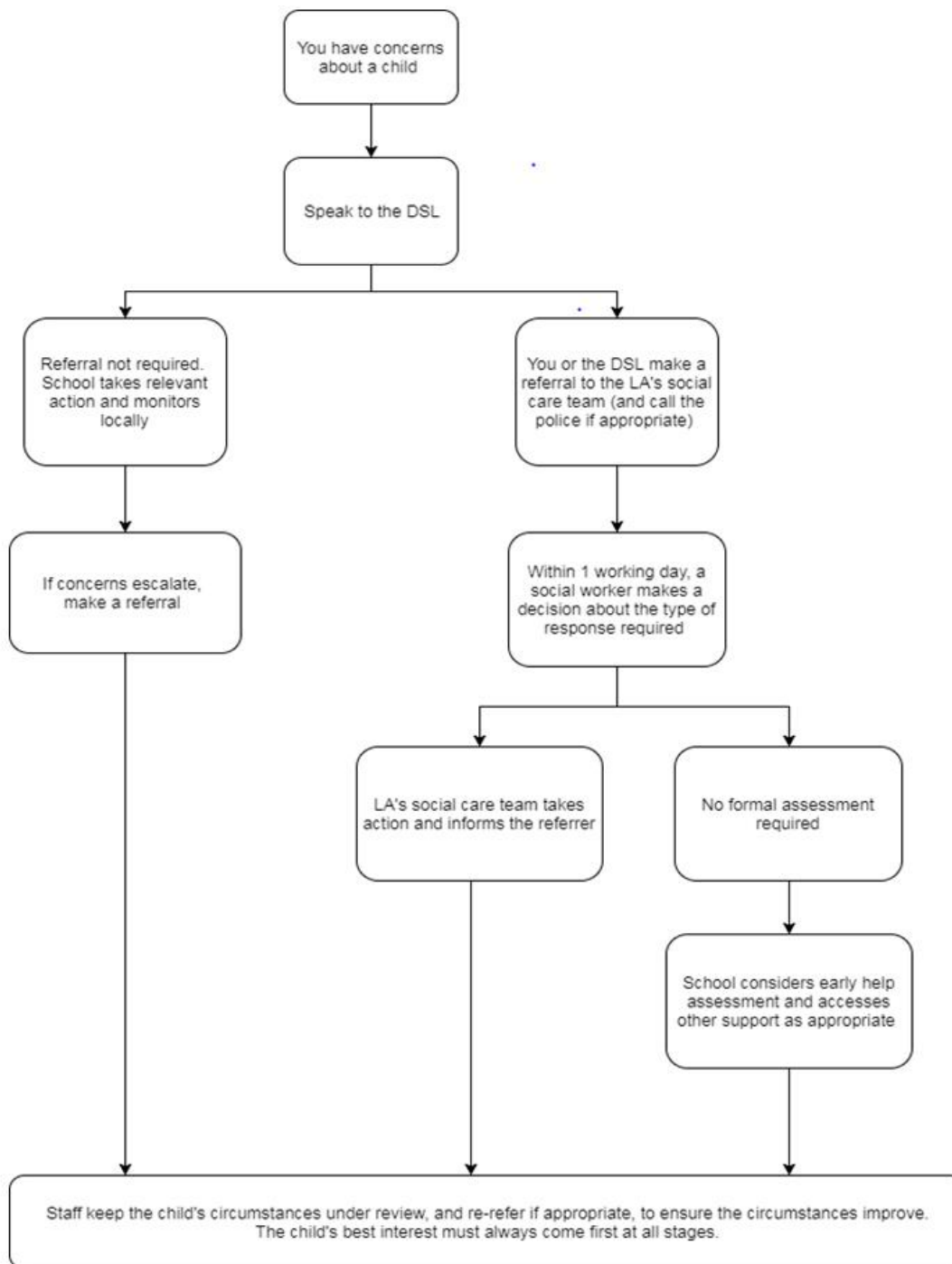
#### **Guidance and helpful documents: -**

- Addressing Trauma and Adversity
- Mental Health and Behaviour in Schools Guidance.
- Preventing and tackling bullying
- PHE Rise Above for Schools programme.
- Every Interaction Matters
- Education recovery
- MIND-Parenting Capacity and Mental Health
- NSPCC-Mental Health and Parenting
- SSCB-Children & Young People who Self Harm or Disclose an Intent to Die by Suicide



**Figure 1: procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



## **7.7 Concerns about a staff member, supply teacher, volunteer or contractor**

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

If the concerns/allegations are about the headteacher, speak to the local authority designated officer (LADO).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

## **7.8 Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

### **Procedures for dealing with allegations of child-on-child abuse**

If a pupil makes an allegation of abuse against another pupil:

- › You must record the allegation and tell the DSL, but do not investigate it
- › The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- › The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- › The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

All staff at our school have the knowledge and awareness that children can and sometimes do abuse other children (often referred to as child-on-child abuse). We have a specific and separate Child on child Abuse

Policy which includes Sexual Violence and Sexual Harassment between children, as well as an anti-bullying and behaviour policy to guide, inform and support children, staff and parents/carers. Child on child abuse including sexual violence and sexual harassment can occur between two children of any age and sex. It can occur with a single child or group of children. This can happen both inside and outside of our setting including online. Children who are victims of child-on-child abuse including sexual violence and sexual harassment will find the experience stressful and distressing. This is likely to have an adverse effect their educational attainment. This type of abuse can exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

All staff are provided with regular CPD to recognise the indicators and signs of child on child abuse so they know how to identify it and respond to reports of it. They understand the importance of the timely challenge of inappropriate behaviours between peers, many listed below, that are abusive in nature.

They are aware of the importance of: -

- Making clear that child on child abuse including sexual violence and sexual harassment is not acceptable and that that we have a zero-tolerance approach.
- Not dismissing peer on peer abuse (incl sexual violence or sexual harassment) as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults e.g., grabbing bottoms, breasts, and genitalia, flicking bras and the lifting up of skirts. All staff know that if we do not challenge and support our children that this will lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that recognises abuse leading to children accepting it as normal and not coming forward to report it.

### **Creating a supportive environment in school and recognises the risk of child-on-child abuse**

At our school we strive for a culture where children feel safe to speak to staff about their experiences. We know that the initial response to a report from a child is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe. We never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. We reassure victims that they should not feel ashamed for making a report. We have well promoted and easily understood systems in place so that our children feel confident to knowing their concerns will be treated seriously

Victims of child-on-child abuse will be supported by the school’s pastoral system and referred to specialist agencies if appropriate. Risk assessment and/or safety planning are an integral part of this support plan, particularly regarding the post incident management. All staff understand, that even if there are no reports in our setting, this does not mean that it is not happening, it may be the case that it is just not being reported. As such it is important that if staff at East Park Academy have any concerns regarding child-on-child abuse, they speak to their Designated Safeguarding Lead (DSL) or deputy (DDSL). Our staff will not develop high thresholds before acting.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence such as rape, assault by penetration and sexual assault and may include an online element which facilitates, threatens and/or encourages sexual violence. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery) Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and • initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

If staff have a concern about a child or a child makes a report to them, they will follow the safeguarding referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy).

Schools' behaviour policy will support any sanctions.

Our school takes child on child abuse as seriously as abuse by adults and should be subject to the same child protection procedures.

› We ensure all staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- › Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- › There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

#### **Guidance Documents:**

- Staffscb-Responding to Sexting Guidance
- Disrespect NoBody
- CEOP-Safety centre 16
- UKCIS Guidance: Sharing Nudes and Semi-Nudes
- Sexual violence and sexual harassment between children in schools and colleges (publishing.service.gov.uk)
- Review of sexual abuse in schools and colleges – GOV.UK ([www.gov.uk](http://www.gov.uk))
- Searching, screening and confiscation (publishing.service.gov.uk)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people – GOV.UK ([www.gov.uk](http://www.gov.uk))

#### **Racist Incidents**

Our guidance on racist incidents is set out separately in our Equality & Diversity Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

#### **Anti-bullying**

Our school policy on anti-bullying is set out in the school's Anti-Bullying Policy and acknowledges different types of bullying e.g., cyber, racist, homophobic and gender related bullying. At our school we will support the victims of child-on-child abuse with internal/external professionals, continuous reflective practice linked to our values, offering a broad and balanced the curriculum (PSHCE/RE/SMSC), regular parental consultation events, the NSPCC.

#### **Recording Bullying Incidents**

We keep a record of known bullying incidents on an electronic tracking system (BROMCOM). All staff are aware that children with SEND and/or perceived differences are more susceptible to being bullied/victims of child abuse. We keep records of all bullying incidents and have a school motto for supporting children with their online safety 'Zip It, Block It, Flag It'.

#### **Sexual violence and/or sexual harassment**

Sexual violence and sexual harassment is not acceptable and will not be tolerated. Sexual violence includes online abuse which facilitates, threatens and/or encourages sexual violence. Including causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. As always, all staff should act in the best interests of the child.

Things to consider following a report of sexual violence and/or sexual harassment:

- the wishes of the victim in terms of how they want to proceed

- the nature of the alleged incident • the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children
- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, school or college staff
- contextual safeguarding issues Risk and needs assessments should be recorded and kept under review. The designated safeguarding lead (or deputy) should ensure they are engaging with children's social care and specialist services as required.

Four scenarios to consider when managing any reports of sexual violence and/or sexual harassment.

1. Manage internally – the school manages incidents
2. Early help – multi-agency early help
3. Referrals to children's social care
4. Reporting to the police – in parallel to children's social care

### **Sexting**

In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in August 2016: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'. 'sexting' refers specifically to the consensual and non-consensual sharing of nude and semi-nude images and/or videos

### **Upskirting**

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

### **The child's wishes**

Where there is a safeguarding concern, school leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes will operate with the best interests of the child at their heart.

Ongoing response for the victim

- Appropriate support should be available on an ongoing basis to the victim. The school will consider safeguarding issues around the victim and alleged perpetrator sharing classes and sharing space at school or college. Safeguarding and supporting the alleged perpetrator
- The school will manage the balance between supporting the victim and ensuring the alleged perpetrator has an education and safeguarding support themselves Further information can be found 7.9 Sharing of nudes and semi-nudes ('sexting')

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- › View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

- › Delete the imagery or ask the pupil to delete it
- › Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- › Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- › Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- › Whether there is an immediate risk to pupil(s)
- › If a referral needs to be made to the police and/or children's social care
- › If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- › What further information is required to decide on the best response
- › Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- › Whether immediate action should be taken to delete or remove images or videos from devices or online services
- › Any relevant facts about the pupils involved which would influence risk assessment
- › If there is a need to contact another school, college, setting or individual
- › Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- › The incident involves an adult
- › There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- › What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The imagery involves sexual acts and any pupil in the images or videos is under 13
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents/carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done by the DSL

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- › What it is
- › How it is most likely to be encountered
- › The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- › Issues of legality
- › The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- › Specific requests or pressure to provide (or forward) such images
- › The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## **7.10 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- › Put systems in place for pupils to confidently report abuse
- › Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- › Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

## **8. Online safety and the use of mobile technology**

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, recognizing on, sexual predation, and technology often provides the platform that facilitates harm.

At our school we realise that it is essential for our children to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole school/college approach to online safety which empowers us to protect and educate pupils, students, and staff in their use of technology and establishes



mechanisms for us to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable, but can be recognised into four areas of risk:

**Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, recognising on, and extremism.

**Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and seminudes and/or pornography, sharing other explicit images and online bullying; and

**Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>). We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures.

We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have filters and monitoring systems in place, and these are regulated, and risk assessed as part of the prevent duty. We have an online safety policy which identifies the usage and expected behaviour of children/students.

As a school we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding. Education at home/Remote learning: - Where children are being asked to learn online at home, our school will refer to and use the links and resources provided by the DfE; Safeguarding in schools, colleges and other providers and Safeguarding in remote education. Guidance Documents: • Children's Commissioner-Online Safety • Teaching online safety in education settings • Appropriate Filtering and Monitoring • CEOP-Safety Centre • National Cyber Security Centre • NSPCC-Undertaking remote teaching safely • PHSE-Advice on addressing coronavirus (COVID-19) • 360 Degree Safe – Online Safety Review Tool • UKCCIS-UK Council for Child Internet Safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- › Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- › Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- › Set clear guidelines for the use of mobile phones for the whole school community
- › Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

**To meet our aims and address the risks above we will:**

- › Educate pupils about online safety as part of our curriculum:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- › Train staff as part of their induction, of safe internet use and online safeguarding issues including cyber-bullying and the risks of online. All staff members will receive refresher training at least once each academic year

- › Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- › Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Ensure children are not permitted to bring mobile phones to school. If a for a specific reason a parents makes a case to the school as to why a child should being a phone and this has been agreed by the Head/ Deputy/ Assistant Head then the child must bring the phone to the Admin Office when they arrive in school and then collect it at the end of school when they leave
  - The school accepts that employees will bring their mobile phones to work. As a general rule, employees are not permitted to make/receive calls/texts during work time. (excluding break times and then this should only be done in a phone designated space – staff room, upstairs room, school offices)
  - Staff should ensure that mobile phones are turned off or on silent at all times during the hours children are in school while on school premises. They should be kept in a locker or bag and not be left on display.
  - In the event that an employee has a particular reason for a specified period of time, they may request via the leaders with overall responsibility for their phase (Deputy or assistant head) that they leave their phone on during working hours. Usually if someone needs to contact staff for emergency reasons during the school working day they should ring the school phone and someone from the office will fetch the member of staff immediately. Manor Multi Academy Trust Page 2 of 3 Mobile Device Policy
  - Staff are not at any time permitted to use recording equipment on their mobile phones, for example: to take photographs or videos of children.
  - When on an educational visit, staff should carry a phone with them to keep contact with school and inform the school on arrival/departure times and any issues which may occur during the visit. This includes when taking children swimming.
  - Staff are not permitted to take pictures of children on an educational visit on their personal mobile phones. School cameras or school iPad's should be used to take the pictures.
  - Mobile phones should not be used in a space where children are present (eg. Classroom, playground. Are permitted to have their mobile phones about their person; however there is a clear expectation that all personal use is limited to allocated lunch and/or tea breaks and the phone will be used in a phone designated place – staff room, upstairs room, school offices)
  - Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

We have put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

We carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Communicating with parents, carers and pupils It is our aim to maintain professional practice as much as possible. When communicating online with parents and pupils, we:

- communicate within school hours as much as possible (or hours agreed with the school to suit the needs of staff)
- communicate through the school channels approved by the senior leadership team
- use school email accounts (not personal ones)
- use school devices over personal devices wherever possible

- advise teachers not to share personal information Virtual lessons and live streaming our school has followed the advice of the National Cyber Security Centre (NCSC) on our remote education offer to children. In addition, guidance from the UK Safer Internet Centre on safe remote learning includes detailed advice on live, online teaching, and the safeguarding guidance from London grid for learning (LGfL) has provided the school with platform-specific advice. Teaching from home is different to teaching in the classroom. Teachers should try to find a quiet or private room or area to talk to pupils, parents or carers. When broadcasting a lesson or making a recording, consider what will be in the background. Further information can be found in our Remote Learning policy and procedures.

### **Providing pastoral care remotely**

Helping parents, carers and pupils to make a weekly plan or includes time for education, playing and relaxing is important to reduce stress and anxiety for families. As set out in Public Health England's guidance for parents and carers, routine can give children and young people an increased feeling of safety in the context of uncertainty.

We consider whether one-to-one sessions could be appropriate in some circumstances. For example, to provide pastoral care or provide support for pupils with special educational needs and disabilities (SEND).

This may be conducted through Microsoft Teams a trusted professional platform. Virtual meetings should be discussed and approved by the senior leadership team to assess any risks. There may be helpful solutions, such as including a parent or additional staff member in the call. Personal data and GDPR we follow the guidance outlined in the data protection: toolkit for schools when managing personal data and may need to consider:

taking care not to share contact details when emailing multiple people

being careful when sharing usernames and other personal data for access to online resources

providing access to school data systems safely

## **9. Children Missing in Education**

Children Missing in Education (CME) All professionals working with children, as well as the wider community can help by remaining vigilant to children's safety. The law states every child should be receiving an education, and we stand a better chance of ensuring a child's safety if we know where and how they are receiving this. The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify children and young people of compulsory school age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for children who go missing from education. A child going missing, particularly repeatedly, can be a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future. Our school will hold two or more emergency contact numbers for each pupil. It is good practice to give our school additional options to contact a responsible adult when a child missing education, is also identified as a welfare and/or safeguarding concern. The school will notify the Local Authority of any pupil/student who fails to attend school regularly after making reasonable enquiries or has been absent without the school's permission for a continuous period of 10 days or more. The school (regardless of designation) will also notify the Local Authority of any pupil/student who is to be deleted from the admission register because s/he:

- Has been taken out of school by their parents and is being educated outside the school system (e.g. elective home education).
- Has ceased to attend school and no longer lives within a reasonable distance of the school at which s/he is registered (moved within the city, within the country or moved abroad but failed to notify the school of the change).
- Displaced because of a crisis e.g. domestic violence or homelessness.
- Has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither s/he nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- Is in custody for a period of more than four months due to a final court order and the proprietor does not

reasonably believe that s/he will return to the school at the end of that period; or • Has been permanently excluded. Our school will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of children that would be considered 'missing' Child Missing from Home or Care There are strong links between children involved in criminal and sexual exploitation and other behaviours such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse. In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children. Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point. Guidance document • Children who run away or go missing from home or care

## 10. Emergency Contacts for Children

In our school parents/carers are required to provide more available emergency contacts for children. Keeping Children Safe in Education (2022) says that schools should have at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at the home.

We monitor attendance carefully and address poor or irregular attendance without delay.

In accordance with the guidance in Keeping Children Safe in Education the school has: - professionals who follow procedures when children do not attend regularly – appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions) – staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage. – procedures to inform the Local Authority when pupils are taken off-roll for: a. leaving the school to be home educated b. moving away from the school's location c. remaining medically unfit beyond compulsory school age d. being in custody for four months or more (and will not return to school afterwards); or e. are permanently excluded If a child goes missing in the school building during the hours of the school day then the DSL must be informed immediately as well as the office manager. All parties will follow the necessary administration procedures via SIMS to check the child's whereabouts then begin a full search of the building. In the event that a child cannot be located then the parents and police must be informed as well as a referral to MASH completed.

## 11. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- › Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

- › Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

## 12. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognizing abuse and neglect in this group, including:

- › Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- › Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- › The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- › Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. This includes:

- Age appropriate weekly Personal Life Skills (PSHE and RSE) lessons to support children's understanding of risks outside the school gates and how to keep themselves safe.
- A clear structure and approach to assessing children's extra additional needs, including mental health needs.
- Access to zones of regulation within the classroom to support children's understanding of emotions and how to express and deal with them.
- Designated adults for children that need a rapport to feel confident to talk and share their experiences.
- Access to personalized provision to support with worries, anxieties, separation, families and self-esteem, supporting a child's positive mental health and wellbeing.
- Add details of the pastoral support you offer these pupils, as well as the support you provide to help pupils overcome any communication barriers they face.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

## 13. Alternative Provisions e.g. Foster Care

At our school we are responsible for the safeguarding of pupils when they're placed in an alternative provision. We obtain a written statement from the provider that they have completed all the vetting and barring checks (enhanced DBS) that are necessary. We maintain in weekly contact with alternative providers, family and pupil.

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

### Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country.

In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

### **Bail Conditions and Children with Family Members in Prison**

It is unlikely that a child will be on police bail with conditions attached, so it is essential that when there is a criminal investigation that there is joined up working between the school, children's social care and the police so that the victim, alleged perpetrator and other children involved are supported. • Managing any delays in the criminal process • There may be delays in any criminal case but we should not wait for the outcome before protecting the victim, alleged perpetrator and other children in the school Regardless of whether a child is convicted of a crime or not, all the children involved should be protected. National Information Centre on Children of Offenders (NICCO) Supporting all professionals to work with offenders' children and their families [www.nicco.org.uk](http://www.nicco.org.uk)

## **14. Pupils with a social worker**

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

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

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

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

## **15. Looked-after and previously looked-after children**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- › Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- › The DSL has details of children's social workers and relevant virtual school heads



We have appointed a designated teacher, Darren Jones (Head of School) who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- › Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- › Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## 16. Complaints and concerns about school safeguarding policies

### 16.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

### 16.2 Other complaints

Our school handles safeguarding-related complaints of other types through our Trust Complaints Policy

### 16.3 Whistle-blowing

Our Trust has a separate whistle-blowing policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures

## 17. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. We all record all incidents on CPOMS

Records will include:

- › A clear and comprehensive summary of the concern
- › Details of how the concern was followed up and resolved
- › A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- › **5 days** for an in-year transfer, or within
- › **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- › Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- › Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 18. Training

### 18.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- › Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- › Be in line with advice from the 3 safeguarding partners
- › Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

### 18.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

### 18.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- › Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- › Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding



As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

#### **18.4 Recruitment – interview panels**

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

#### **18.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

### **19. Curriculum**

One concept that permeates KCSiE is by Dr. Firmin at the University of Bedfordshire on safeguarding adolescents, particularly in their social settings beyond school. Her research is about informing policy and practise. The research shows how important it is that the assessments of children take into account all of their social sphere, not only that at school. More information can be found on the Contextual Safeguarding Network's website: <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>. • Safeguarding is taught throughout the curriculum at East Park Academy. British Values, Science, PHSE, RE, SMSC, Aspects of English, RE, PE, ICT, Geography, History. • Our curriculum includes opportunities to discuss feelings and emotions, and helps our children to think about their own personal safety and their rights as individuals to be kept safe from harm. • We teach our children about the uses and misuses of drugs, including legal highs, at an age appropriate time and level. • Our Relationships Sex Education (RSE) teaches our children about keeping themselves safe from harm, at an age appropriate level. • Our curriculum teaching children about radicalization and how to recognize they are being negatively influenced by external groups with bias views • We have clear guidance to help children to use the internet (including social media) safely and have appropriate filters in place to prevent pupils accessing inappropriate materials. • Our policies and agreed practices for child protection, health and safety, behaviour management, attendance and looked after children all comply with the recommendations for safeguarding children at school.

### **20. Links with other policies**

This policy links to the following policies and procedures:

- › Behaviour
- › Child on child abuse, including anti bullying
- › Staff code of conduct
- › Complaints
- › Health and safety
- › Attendance
- › Online safety
- › Mobile phone use
- › Equality Relationships and sex education
- › First aid
- › Curriculum

- › Designated teacher for looked-after and previously looked-after children
- › Privacy notices
- › Anti-bullying
- › Whistleblowing

## **21. Monitoring arrangements**

This policy will be reviewed **annually** by Trustees. At every review, it will be approved by the full governing board.

# These appendices are based on the Department for Education's statutory guidance, *Keeping Children Safe in Education*.

## Appendix 1: types of abuse

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- › Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- › 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
- › Seeing or hearing the ill-treatment of another
- › Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**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
- › 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** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- › Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- › Protect a child from physical and emotional harm or danger
- › Ensure adequate supervision (including the use of inadequate care-givers)
- › Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Appendix 2: safer recruitment and DBS checks – policy and procedures

### Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

#### Advertising

When advertising roles, we will make clear:

- › Our school's commitment to safeguarding and promoting the welfare of children
- › That safeguarding checks will be undertaken
- › The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- › Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

#### Application forms

Our application forms will:

- › Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- › Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

#### Shortlisting

Our shortlisting process will involve at least 2 people and will:

- › Consider any inconsistencies and look for gaps in employment and reasons given for them
- › Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- › Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- › Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

#### Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- › Not accept open references
- › Liaise directly with referees and verify any information contained within references with the referees
- › Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- › Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- › Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- › Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- › Resolve any concerns before any appointment is confirmed

### **Interview and selection**

When interviewing candidates, we will:

- › Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- › Explore any potential areas of concern to determine the candidate's suitability to work with children
- › Record all information considered and decisions made

### **Pre-appointment vetting checks**

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

#### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- › Verify their identity
- › Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- › Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- › Verify their mental and physical fitness to carry out their work responsibilities
- › Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- › Verify their professional qualifications, as appropriate
- › Ensure they are not subject to a prohibition order if they are employed to be a teacher
- › Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions

or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

- › Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Regulated activity** means a person who will be:

- › Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- › Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- › Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- › There are concerns about an existing member of staff's suitability to work with children; or
- › An individual moves from a post that is not regulated activity to one that is; or
- › There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- › We believe the individual has engaged in [relevant conduct](#); or
- › We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- › We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- › The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- › An enhanced DBS check with barred list information for contractors engaging in regulated activity
- › An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- › Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- › Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- › Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- › Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Members, Trustees and Governors**

All Members, Trustees and Governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

- › A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- › Identity
- › Right to work in the UK
- › Other checks deemed necessary if they have lived or worked outside the UK

All Members, Trustees and governors will also have the following checks:

- › Identity

- › Right to work in the UK
- › Other checks deemed necessary if they have lived or worked outside the UK

### **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.



## Appendix 3: allegations of abuse made against staff

### Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, 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 they 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 – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- › Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- › Providing an assistant to be present when the individual has contact with children
- › Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- › Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- › Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Academy Trust.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### Definitions for outcomes of allegation investigations

- › **Substantiated:** there is sufficient evidence to prove the allegation
- › **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- › **False:** there is sufficient evidence to disprove the allegation
- › **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- › **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- › Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- › Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- › Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- › Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- › Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- › **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- › **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- › **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- › Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- › Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- › Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- › Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- › We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- › The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- › We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- › We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

## **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- › Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- › If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- › If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

## **Specific actions**

### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- › Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- › Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

- › Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- › Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

## **Confidentiality and information sharing**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

## **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation

- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## References

When providing employer references, we will:

- › Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- › Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

## Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- › Suspicion
- › Complaint
- › Safeguarding concern or allegation from another member of staff
- › Disclosure made by a child, parent or other adult within or outside the school

- › Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- › Being overly friendly with children
- › Having favourites
- › Taking photographs of children on their mobile phone
- › Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- › Humiliating pupils

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- › Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- › Empowering staff to share any low-level concerns as per section 7.7 of this policy
- › Empowering staff to self-refer
- › Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- › Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- › Helping to identify any weakness in the school's safeguarding system

### **Responding to low-level concerns**

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- › Directly to the person who raised the concern, unless it has been raised anonymously
- › To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- › Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

- › Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- › Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## **References**

We will not include low-level concerns in references unless:

- › The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- › The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance



## Appendix 4: specific safeguarding issues

### Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- › Are at risk of harm or neglect
- › Are at risk of forced marriage or FGM
- › Come from Gypsy, Roma, or Traveller families
- › Come from the families of service personnel
- › Go missing or run away from home or care
- › Are supervised by the youth justice system
- › Cease to attend a school
- › Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- › Appearing with unexplained gifts or new possessions
- › Associating with other young people involved in exploitation
- › Suffering from changes in emotional wellbeing
- › Misusing drugs and alcohol

- › Going missing for periods of time or regularly coming home late
- › Regularly missing school or education
- › Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- › Having an older boyfriend or girlfriend
- › Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- › Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- › Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- › Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- › Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- › Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- › Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- › Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- › Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- › Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

## **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass –

The DSL will provide support according to the child's needs and update records about their circumstances.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

## **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

## **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- › A pupil confiding in a professional that FGM has taken place
- › A mother/family member disclosing that FGM has been carried out
- › A family/pupil already being known to social services in relation to other safeguarding issues
- › A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- › The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- › FGM being known to be practised in the girl's community or country of origin
- › A parent or family member expressing concern that FGM may be carried out
- › A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- › A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- › Speak to the pupil about the concerns in a secure and private place
- › Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- › Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk)
- › Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### Preventing radicalisation

- › **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- › **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- › **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils’ behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- › Refusal to engage with, or becoming abusive to, peers who are different from themselves
- › Becoming susceptible to conspiracy theories and feelings of persecution
- › Changes in friendship groups and appearance
- › Rejecting activities they used to enjoy
- › Converting to a new religion
- › Isolating themselves from family and friends
- › Talking as if from a scripted speech
- › An unwillingness or inability to discuss their views
- › A sudden disrespectful attitude towards others
- › Increased levels of anger
- › Increased secretiveness, especially around internet use
- › Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- › Accessing extremist material online, including on Facebook or Twitter
- › Possessing extremist literature
- › Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including

## **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

- › Between 2 children of any age and sex
- › Through a group of children sexually assaulting or sexually harassing a single child or group of children
- › Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- › Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- › Regularly review decisions and actions, and update policies with lessons learnt

- › Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- › Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- › Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- › Challenging inappropriate behaviours
- › Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- › Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

## **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- › Increased absence from school
- › Change in friendships or relationships with older individuals or groups
- › Significant decline in performance
- › Signs of self-harm or a significant change in wellbeing
- › Signs of assault or unexplained injuries
- › Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- › Being male
- › Having been frequently absent or permanently excluded from school
- › Having experienced child maltreatment
- › Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

## **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.



Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- › Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- › The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

## **Non-collection of children**

If a child is not collected at the end of the session/day, we will:

- Contact the parent/carer by phone. If there is no answer a message is left. Our staff will ensure that the child receives a high standard of care in order to cause as little distress as possible. Parents/carers will be informed of the procedures so that, if they are unavoidably delayed, they will be reassured that their child will be properly cared for.
- Attempts are made to phone other contacts listed on the school database. If there is no answer a message is left where this is possible.
- The child will not be permitted to leave the premises with anyone other than those named on the contact list unless there has been a specific arrangement made with a parent/carer.
- If no-one collects the child after one hour and there is no-one who can be contacted to collect the child, we will contact the Multi Agency Safeguarding Hub at the Local Authority.
- The child will remain at school in the care of two members of staff until the child is safely collected either by the parents or by a social worker.
- Children's Services will aim to find the parent or relative. If they are unable to do so, the child will be admitted into the care of the local authority.
- A full written report of the incident is recorded on CPOMS

## **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Undertake reasonable enquiries to establish the reason for this absence.
- Contact parents/carers.
- Check local authority school admissions.
- Conduct a home visit, following appropriate risk assessment, and making enquiries with neighbours or relatives.
- Contact the local authority where a child lives, if different from where the school is.
- Check with other agencies involved with the child or family.
- Check with the local authority or school to which a child may have moved.
- Pupils will remain on the school roll until they have been located and either returned to school or transferred to another local authority.
- A full written report of the incident is recorded on CPOMS.