



## CHILD PROTECTION AND SAFEGUARDING POLICY

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## 1. Policy statement and principles

The Governors and Finchley Catholic High School fully recognise the responsibility and duty placed upon them to have arrangements in place to safeguard and promote the welfare of all students at the school and that all staff and volunteers have a full and active part to play in protecting students from harm.

We believe that our school provides a positive, caring, safe and stimulating environment in which students can learn and which promotes the spiritual, social, physical and emotional wellbeing of each individual.

The school's safeguarding arrangements are inspected by Ofsted under the judgements on the quality of leadership and management and also the impact of leadership and management on the personal development, behaviour and welfare of children and learners.

### Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of the Barnet Safeguarding Children Board (BSCB).

### Policy principles:

- The school's responsibility to safeguard and promote the welfare of children is of paramount importance and there is a climate of trust, where disclosures are taken seriously and acted upon quickly.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Children who are safe and feel safe are better equipped to learn.
- This school is committed to safeguarding and promoting the welfare of children and young people and insists all staff and volunteers to share this commitment.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or in school.
- All staff members will maintain an attitude of 'It could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- If, at any point, there is a risk of immediate serious harm to a child a referral will be made to Children's Social Care immediately. **Anybody can make a referral.** If the child's situation does not appear to be improving, any staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some stage.
- Pupils and staff involved in child protection issues will receive appropriate support.
- All adults within our school, who have access to students, have been checked as to their suitability to work with children and young people.
- This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review.

### Policy aims:

- To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities.
- To ensure consistent good practice.
- To demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- To contribute to the school's safeguarding portfolio.

## Terminology

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

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

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

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

For the purposes of this policy, the term “**harmful sexual behaviour**” includes, but is not limited to, the following actions: Using sexually explicit words and phrases, Inappropriate touching, Sexual violence or threats, Full penetrative sex with other children or adults

In accordance with the DfE’s guidance, ‘Sexual violence and sexual harassment between children in schools and colleges’ (2018), and for the purposes of this policy, the term “**sexual harassment**” is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child’s dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

For the purpose of this policy, the term “**sexual violence**” encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

## 2. Safeguarding legislation and guidance

This policy has been created with due regard to all relevant legislation including, but not limited to, the following:

### Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers’ Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- General Data Protection Regulation (GDPR)
- Data Protection Act 2018 [New for 2018] [Schools providing education to pupils under the age of eight only] The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018

### Statutory guidance

- HM Government (2013) ‘Multi-agency practice guidelines: Handling cases of Forced Marriage’
- DfE (2018) ‘Working Together to Safeguard Children’
- DfE (2015) ‘The Prevent duty’
- DfE (2018) ‘Keeping children safe in education’
- DfE (2018) ‘Disqualification under the Childcare Act 2006’

### Non-statutory guidance

- DfE (2015) ‘What to do if you’re worried a child is being abused’
- DfE (2018) ‘Information sharing’
- DfE (2017) ‘Child sexual exploitation’
- DfE (2018) ‘Sexual violence and sexual harassment between children in schools and colleges’

Other relevant school policies include:

- Physical restraint policy.
- Behaviour policy.

- Complaints procedure.
- Anti-Bullying policy.
- Whistleblowing policy.
- Grievance policy.
- Disciplinary policy
- Acceptable Users Policy
- Data Protection Policy

All staff must read Part One of **Keeping Children Safe in Education 2018**. Staff can find a copy in the Safeguarding folder in the Staff 'X' drive, safeguarding folder. In addition, all staff who work directly with children must read Annex A which is also in the 'X' drive, safeguarding folder and have signed that they have read it.

### **Key personnel**

**The designated safeguarding lead (DSL) is** Sue Murphy (Assistant Headteacher)

Contact details: email: smurphy@finchleycatholic.org.uk

**Other staff trained to undertake the functions of the designated safeguarding lead are**

Ciaran Prendergast, Carly Rendell, Martin Smith, Jane Tierney and Hannah Williams

**The nominated safeguarding and child protection governor is** Sarah Paterson

**The Headteacher is** Niamh Arnall

**The Assistant Headteacher with responsibility for Pastoral Welfare is** Sue Murphy

Due to their day-to-day contact with pupils, staff in school are uniquely placed to observe changes in children's behaviour and the outward signs of abuse, neglect, exploitation and radicalisation. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that all school staff are alert to the signs of abuse, are approachable and trusted by pupils/students, listen actively to children and understand the procedures for reporting their concerns. The school will act on identified concerns and provide early help to prevent concerns from escalating.

### **3. Roles and responsibilities**

**The governing body has a duty to:**

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children' (2018).
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that a member of the governing body is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.

- Finchley Catholic High School has appointed 5 deputy DSLs to provide support to the DSL and will ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Make sure that pupils are taught about safeguarding, including protection against dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff members are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBT, SEND etc.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff or volunteers.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the virtual school head to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing body have been subject to an enhanced DBS check.

The **headteacher** has a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession.

- Ensure that the policies and procedures adopted by the governing body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.
- Refer any allegation regarding a member of staff or an adult in the school to the LADO (Local Authority Designated Officer)
- Provide staff upon induction with:
  - The Child Protection and Safeguarding Policy,
  - Staff Code of Conduct,
  - Part one and Appendix A of the 'Keeping children safe in education' (KCSIE) guidance,
  - The School Behaviour Policy,
  - The School Children Missing from Education Policy,
  - online safety training,
  - and the identity of the DSL and any deputies.

#### **The Designated Safeguarding Lead has a duty to:**

- Refer all cases of suspected abuse to children's social care services, MASH (the Multi Agency Safeguarding Hub) the DBS, and the police in cases where a crime has been committed.
- Refer cases of radicalisation to MASH for consideration of a referral to the Channel Panel.
- Liaise with the headteacher to inform them of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
- Understand the assessment process for providing early help and intervention.
- Support staff members in liaising with other agencies and setting up inter-agency assessment where early help is deemed appropriate.
- Keep cases of early help under constant review and refer them to the CSCS (Children Social Care Services) if the situation does not appear to be improving.
- Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the **staff induction process**.
- Be alert to the specific requirements of children in need, including those with SEND and young carers.
- Keep detailed, accurate and secure records of concerns and referrals.
- Secure access to resources and attend any relevant training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- Work with the governing body to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding.
- Ensure that a pupil's child protection file is copied when transferring to a new school.
- Hold the details of the LA personal advisor and liaise with them as necessary.
- **NB. The school will determine what "available" means, e.g. it may be appropriate to be accessible by electronic means such as phone or Skype.**

- The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.
- Other staff members have a responsibility to:
- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Provide a safe environment in which pupils can learn.
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Be aware of the early help process and understand their role in it.
- Where appropriate, act as the lead professional in undertaking an early help assessment.
- Be aware of, and understand, the process for making referrals to MASH, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to MASH and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.

#### **4. Good practice guidelines and staff code of conduct**

To meet and maintain our responsibilities towards pupils we need to agree standards of good practice which form a code of conduct for all staff. Good practice includes:

- Treating all pupils with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving pupils in decisions that affect them.
- Encouraging positive, respectful and safe behaviour among pupils.
- Being a good listener.
- Being alert to changes in pupils' behaviour and to signs of abuse and neglect and exploitation.
- Recognising that challenging behaviour may be an indicator of abuse.
- Reading and understanding the school's child protection policy, staff behaviour policy (Code of Conduct and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, sexual exploitation, extremism, e-safety and information-sharing).
- Asking the pupil's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid.
- Maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language.
- Being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.



- Applying the use of reasonable force and physical intervention only as a last resort and in compliance with school procedures and BSCB guidance.
- Referring all concerns about a pupil's safety and welfare to the DSL or, if necessary, directly to the Police or Children's Social Care.
- Following the school's rules with regard to communication and relationships with pupils and use of social media and online networking.
- Following the school's rules with regard to communication and relationships with pupils, including via social media.

## **5. Abuse of trust**

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

## **6. Inter-agency working**

- The school contributes to inter-agency working as part of its statutory duty.
- The school will work with CSCS, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to inter-agency plans to provide additional support.
- The school recognises the importance of information sharing between professionals and local agencies in order to effectively meet pupils' needs.
- Considering the above, staff members are aware that whilst the GDPR and the Data Protection Act 2018 places a duty on schools to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.
- Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils.
- The school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

## **7. Abuse and neglect**

- All members of staff will be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another.
- All staff members will be aware of the indicators of abuse and the appropriate action to take following a pupil being identified as at potential risk of abuse or neglect.
- When identifying pupils at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:
- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Lack of concentration and acting withdrawn
- Knowledge ahead of their age, e.g. sexual knowledge.
- Use of explicit language
- Fear of abandonment

- Depression and low self-esteem
- All members of staff will be aware of the indicators of peer-on-peer abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting.
- All staff will be aware of the necessary procedures to follow to prevent peer-on-peer abuse, as outlined in the school's **Anti-Bullying Policy**.
- All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and sexting, and will understand that these put pupils in danger.
- Staff members will be aware of the effects of a pupil witnessing an incident of abuse, such as witnessing domestic violence at home.

## 8. Types of abuse and neglect

**Abuse:** A form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, e.g. via the internet.

**Physical abuse:** A form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** A form of abuse which involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them, or often making them feel as though they are in danger.

**Sexual abuse:** A form of abuse which involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, and whether or not the child is aware of what is happening. This may involve physical assault, such as penetrative assault and touching, or non-penetrative actions, such as looking at sexual images or encouraging children to behave in inappropriate ways.

**Neglect:** A form of abuse which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve providing inadequate food, clothing or shelter, or the inability to protect a child from physical or emotional harm or ensure access to appropriate medical treatment.

## 9. Concerns about a pupil

- If a member of staff has any concern about a child's welfare, they will act on them immediately by reporting to the DSL or a deputy.
- All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in section 33 of this policy.
- Where the DSL is not available to discuss the concern with, staff members will contact a deputy DSL with the matter.
- If a referral is made to MASH about a child by anyone other than the DSL, the DSL will be informed as soon as possible.
- The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer.
- Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil.
- If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

- If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered.
- All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely.
- If a pupil is in immediate danger, a referral will be made to MASH and/or the police immediately.
- If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.
- Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views.
- When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

## **10. Early help**

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from early help, but in particular staff will be alert to the potential need for early help for pupils who:

- Have SEND (whether or not they have a statutory EHC plan).
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.
- Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.
- All staff will be made aware of the local early help process and understand their role in it.
- The DSL May take the lead where early help is appropriate. Referrals will be discussed within Barnet's 0 – 19 Early Help Hubs and a Lead appointed.

## **11. Pupils with SEND**

The school recognises that pupils with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of pupils. Staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers
- When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration.

- When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's family where appropriate, to ensure that the pupil's needs are effectively met.

## **12. Attendance**

We recognise that full attendance at school is important to the well-being of all our pupils and enables them to access the opportunities made available to them at school. Attendance is monitored closely and we work in partnership with our Educational Welfare Officer (EWO) when patterns of absence give rise to concern. Our attendance policy is set out in a separate document and is reviewed regularly by the governing body.

## **13. A child missing from education**

- A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation.
- Staff will monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures.
- The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 2 school days or more.

### **Admissions register**

- Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending.
- The school will notify the LA within five days of when a pupil's name is added to the admissions register.
- The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.
- **Two** emergency contact details will be held for each pupil where possible.
- Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.
- If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:
  - The full name of the parent with whom the pupil will live
  - The new address
  - The date from when the pupil will live at that address
- If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:
  - The name of the new school
  - The date on which the pupil first attended, or is due to attend, that school
  - Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.
  - To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
  - Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
  - Have been certified by the child's GP/doctor as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
  - Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
  - Have been permanently excluded.
- The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.
  - If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:
    - The full name of the pupil
    - The full name and address of any parent with whom the pupil lives
    - At least one telephone number of the parent with whom the pupil lives
    - The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
    - The name of the pupil's new school and the pupil's expected start date there, if applicable
    - The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)
  - The school will work with the LA to establish methods of making returns for pupils back into the school.
  - The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown.
  - The school will also highlight any other necessary contextual information including safeguarding concerns

#### **14. Homelessness**

The DSL and deputies will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because "they have to"
- Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.
- For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

## **15. Helping children to keep themselves safe**

Keeping Children Safe in Education 2016 requires governing bodies and proprietors to ensure that children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a 'broad and balanced curriculum.'

Children are taught to understand and manage risk through our Personal, Social, Health and Economic (PSHE) education and sex and relationships lessons (also known as tutorial, speakers, activity days and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about e-safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of respect for children and pupils who are encouraged to speak to a member of staff of their choosing about any worries they may have. They are taught to recognise risks in different situations and then decide how to behave responsibly through the PSHE programme, speakers from road safety organisations, CEOP, drugs awareness programmes and our PSCO. That work will include discussions with children about the risks and issues associated with young people sending, receiving and/or disseminating indecent images of themselves and other young people, which is widely referred to as 'sexting'.

It is recognised that a young person may choose to share indecent images with another young person in the context of a romantic or sexual relationship and that she or he may do so without any intention to cause harm or distress to anybody. Although technically an offence, sexting of that nature is referred to as 'experimental sexting' and it is usually not necessary or appropriate to criminalise young people in those circumstances.

However, there are clear risks associated with such behaviour. Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff, as they do with any other safeguarding concern.

When concerns are identified, staff will always speak to children and will inform parents about their concerns unless there is good reason to believe that doing so would place the child at increased risk of significant harm.

## **16. Contextual safeguarding**

- Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and their deputy(s), will always consider the context of incidents – this is known as contextual safeguarding.
- Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.
- The school will provide as much contextual information as possible when making referrals to MASH.

## **17. Support for pupils, families and staff involved in a child protection issue**

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support pupils, their families, and staff by:

- Taking all suspicions and disclosures seriously.

- Nominating a link person who will keep all parties informed and be the central point of contact
- Where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest.
- Responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Storing records securely.
- Offering details of helplines, counselling or other avenues of external support.
- Following the procedures laid down in our child protection, whistle blowing, complaints and disciplinary procedures.
- Co-operating fully with relevant statutory agencies.

## 18. Complaints procedure

Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying or belittling a pupil or discriminating against them in some way. Complaints are managed by the Headteacher, other members of the senior leadership team and governors. An explanation of the complaints procedure is on the website for parents and pupils to access.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

Complaints which escalate into a child protection concern will automatically be managed under the school's child protection procedure.

## 19. Child sexual exploitation (CSE)

For the purpose of this policy, "**child sexual exploitation**" is defined as: a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or increased status of the perpetrator or facilitator
- CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.
- The school has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

### Identifying cases

- School staff members are aware of and look for the key indicators of CSE; these are as follows:
  - Going missing for periods of time or regularly going home late
  - Regularly missing lessons
  - Appearing with unexplained gifts and new possessions
  - Associating with other young people involved in exploitation
  - Having older boyfriends or girlfriends
  - Undergoing mood swings or drastic changes in emotional wellbeing
  - Displaying inappropriate sexualised behaviour
  - Suffering from sexually transmitted infections or becoming pregnant
  - Displaying changes in emotional wellbeing

- Misusing drugs or alcohol

#### **Referring cases**

- Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.

#### **Support**

- The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

## **20. Preventing radicalisation**

For the purpose of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies. Protecting children from the risk of radicalisation is part of the school’s wider safeguarding duties.

- The school will actively assess the risk of pupils being drawn into terrorism.
- Staff will be alert to changes in pupils’ behaviour which could indicate that they may be in need of help or protection.
- Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme via MASH. The school will work with local safeguarding arrangements as appropriate.
- The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.
- Any concerns over radicalisation will be discussed with a child’s parents, unless the school has reason to believe that the child would be placed at risk as a result.

### **Training**

- The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

### **Risk indicators of vulnerable pupils**

Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society
- Indicators of a personal crisis include the following:
  - Family tensions
  - A sense of isolation
  - Low self-esteem
  - Disassociation from existing friendship groups
  - Searching for answers to questions about identity, faith and belonging

Indicators of vulnerability through personal circumstances includes the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination



- Indicators of vulnerability through unmet aspirations include the following:
- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality:
- Experiences of dealing with the police
- Involvement with criminal groups

### **Making a judgement**

When making a judgement, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?
- Is the pupil known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the pupil sympathise with or support illegal/illicit groups?
- Does the pupil support groups with links to extremist activity?
- Has the pupil encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the pupil?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?
- Has there been a significant shift in the pupil's outward appearance that suggests a new social, political or religious influence?
- Has the pupil come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Has the pupil witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the pupil travelled for extended periods of time to international locations?
- Has the pupil employed any methods to disguise their identity?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others?
- Is the pupil the victim of social isolation?
- Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?
- Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?

Critical indicators include where the pupil is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.

- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

### **Channel programme**

#### **The Prevent Education Officer is Perryn Jasper – 020 8359 7371**

- Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable pupil is at risk of being involved in terrorist activities.
- In cases where the school believes a pupil is potentially at serious risk of being radicalised, the headteacher or DSL will contact the Channel programme or MASH.
- The DSL will also support any staff making referrals to the Channel programme or MASH.
- The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.
- The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.
- The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

#### **Building children's resilience**

The school will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British values (school or community values), alongside pupils' spiritual, moral, social and cultural development.
- Allow pupils time to explore sensitive and controversial issues.
- Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach pupils about how democracy, government and law making/enforcement occur.
- Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

#### **Resources**

The school will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Jasper Perryn – the LAs Prevent Education Officer (020 8359 7371)
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The [Educate Against Hate](#) website

## 21. Online safety

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online. Through training, all staff members will be made aware of the following:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a pupil's online activity
- **The school will ensure that suitable filtering systems are in place to prevent children accessing terrorist** and extremist material, in accordance with the school's Data and E-Security Breach Prevention and Management Policy.
- The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what pupils can be taught regarding online teaching.

## 22. Allegations of abuse against other pupils (peer-on-peer abuse)

### Sexual harassment

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a pupil's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment includes:

- Sexual comments.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against another pupil.
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

### Sexual violence

- Sexual violence refers to the three following offences:
  - **Rape:** A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
  - **Assault by Penetration:** A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
  - **Sexual Assault:** A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
  - Harmful sexual behaviours

The term "**harmful sexual behaviour**" is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.

- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not) and where the child may have SEND.

#### **A preventative approach**

- In order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the school will educate pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.
- The school will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:
  - Healthy relationships
  - Respectful behaviour
  - Gender roles, stereotyping and equality
  - Body confidence and self-esteem
  - Prejudiced behaviour
  - That sexual violence and sexual harassment is always wrong
  - Addressing cultures of sexual harassment
- Pupils will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.

#### **Awareness**

- All staff will be aware that pupils of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.
- All staff will be aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.
- All staff will be made aware of the heightened vulnerability of pupils with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil’s SEND and will always explore indicators further.
- LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children.
- The school’s response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.
- Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

#### **Support available if a child has been harmed, is in immediate danger or at risk of harm**

- If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to MASH.
- Within one working day, a social worker will respond to the referrer to explain the action that will be taken.

- **Support available if early help, section 17 and/or section 47 statutory assessments are appropriate**
- If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

#### **Support available if a crime may have been committed**

- Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to MASH. The DSL will be aware of the local process for referrals to both MASH and the police.
- Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.
- The school has a relationship with the local police force and the DSL will liaise closely with the local police presence.

#### **Support available if reports include online behaviour**

- Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.
- If the incident involves sexual images or videos held online, the [Internet Watch Foundation](#) will be consulted to have the material removed.
- Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

#### **Managing disclosures**

- Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.
- If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and reported to the DSL immediately.
- Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same.
- All staff will be trained to handle disclosures. Effective safeguarding practice includes:
  - Never promising confidentiality at the initial stage.
  - Only sharing the report with those necessary for its progression.
  - Explaining to the victim what the next steps will be and who the report will be passed to.
  - Recognising that the person the child chose to disclose the information to is in a position of trust.
  - Being clear about boundaries and how the report will be progressed.
  - Not asking leading questions and only prompting the child with open questions.
  - Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted.
  - Only recording the facts as the child presents them – not the opinions of the note taker.
  - Where the report includes an online element, being aware of searching, screening and confiscation advice and [UKCCIS sexting advice](#).

- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy as one of the staff members).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.
- The DSL will be informed of any allegations of abuse against pupils with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the pupil in mind at all times.

#### **Confidentiality**

- The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.
- The DSL will consider the following when making confidentiality decisions:
  - Parents will be informed unless it will place the victim at greater risk.
  - If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to MASH.
  - Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.
- The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

#### **Anonymity**

- There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.
- When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

#### **Risk assessment**

- The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.
- Risk assessments will consider:
  - The victim.
  - The alleged perpetrator.
  - Other children at the school, especially any actions that are appropriate to protect them.
- Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's Data Protection Policy.

#### **Taking action following a disclosure**

- The DSL or a deputy will decide the school's initial response, taking into consideration:
  - The victim's wishes.
  - The nature of the incident.
  - The ages and developmental stages of the children involved.
  - Any power imbalance between the children.

- Whether the incident is a one-off or part of a pattern.
  - Any ongoing risks.
  - Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
  - The best interests of the child.
  - That sexual violence and sexual harassment are always unacceptable and will not be tolerated.
- Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.
  - For reports of rape and assault by penetration, whilst the school establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.
  - For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.
  - In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

#### **Managing the report**

- The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to MASH or the police, the school will speak to the relevant agency, and will seek and take advice on informing the alleged perpetrator.
- There are four likely outcomes when managing reports of sexual violence or sexual harassment:
  - Managing internally
  - Providing early help
  - Referring to MASH
  - Reporting to the police
- Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.
- The following situations are statutorily clear and do not allow for contrary decisions:
  - A child under the age of 13 can never consent to sexual activity.
  - The age of consent is 16.
  - Sexual intercourse without consent is rape.
  - Rape, assault by penetration and sexual assault are defined in law.
  - Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

#### **Managing internally**

- In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

#### **Providing early help**

- The school may decide that statutory interventions are not required, but that pupils may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

### **Referral to MASH**

- If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to MASH. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with MASH.
- The school will not wait for the outcome of an investigation before protecting the victim and other children.
- The DSL will work closely with CSCS to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.
- If CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.
- If the school agrees with the decision made by CSCS, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

### **Reporting to the police**

- Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to MASH. The DSL and deputies will follow the local process for referral.
- Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with MASH and any appropriate specialist agencies.
- The DSL and governing body or designated governor will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.
- The DSL will be aware of local arrangements and specialist units that investigate child abuse.
- In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

### **Bail conditions**

- Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.
- The school will work with CSCS and the police to support the victim, alleged perpetrator and other children (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.
- The term 'released under investigation' (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail.
- Where bail is deemed necessary, the school will work with CSCS and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education.
- Managing delays in the criminal justice system
- The school will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made.
- The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

### **The end of the criminal process**

- Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable.



- The school will ensure that the victim and perpetrator remain protected from bullying and harassment.
- Where an alleged perpetrator is found not guilty or a case is classed as requiring “no further action”, the school will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support.
- The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.
  - Ongoing support for the victim
- Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:
  - The terminology the school uses to describe the victim
  - The age and developmental stage of the victim
  - The needs and wishes of the victim
  - Whether the victim wishes to continue in their normal routine
  - The victim will not be made to feel ashamed about making a report
  - What a proportionate response looks like
- Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.
- Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.
- The school will provide a physical space for victims to withdraw to.
- Victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies.
- Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.
- If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents.
- If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.
- Ongoing support for the alleged perpetrator
- When considering the support required for an alleged perpetrator, the school will take into account:
  - The terminology they use to describe the alleged perpetrator or perpetrator.
  - The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
  - The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
  - Their age and developmental stage.
  - What a proportionate response looks like.
  - Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.
- When making a decision, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.

- If the alleged perpetrator moves to another school (for any reason), the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.
- The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.
- Disciplining the alleged perpetrator
- Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.
- The school will make such decisions on a case-by-case basis, with the DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.
- The school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.
- Disciplinary action and support can take place at the same time.
- The school will be clear whether action taken is disciplinary, supportive or both.
- Shared classes
- Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school’s duty to educate against its duty to safeguard. The best interests of the pupil will always come first.
- Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.
- Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other pupils.
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.
- Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.
- In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

#### **Working with parents and carers**

- In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.
- The school will meet the victim’s parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.
- Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons

behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

- Clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

### **Safeguarding other children**

- Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.
- It is likely that children will “take sides” following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.
- The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.
- As part of the school’s risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

### **23. FGM – Female Genital Mutilation**

- For the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs.
- FGM is considered a form of abuse in the UK and is illegal.
- All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care and/or the police.
- Teaching staff are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.
- **NB.** The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.
- There are a range of potential indicators that a pupil may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the pupil.
- Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.
- Indicators that may show a heightened risk of FGM include the following:
  - The socio-economic position of the family and their level of integration into UK society
  - Any girl with a mother or sister who has been subjected to FGM
  - Any girl withdrawn from PSHE
- Indicators that may show FGM could take place soon include the following:
  - When a female family elder is visiting from a country of origin
  - A girl may confide that she is to have a ‘special procedure’ or a ceremony to ‘become a woman’
  - A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
  - A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

- Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.
- Indicators that FGM may have already taken place include the following:
  - Difficulty walking, sitting or standing
  - Spending longer than normal in the bathroom or toilet
  - Spending long periods of time away from a classroom during the day with bladder or menstrual problems
  - Prolonged or repeated absences from school followed by withdrawal or depression
  - Reluctance to undergo normal medical examinations
  - Asking for help, but not being explicit about the problem due to embarrassment or fear
- Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve MASH as appropriate.
- FGM is also included in the definition of ‘honour-based’ violence (HBV), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.
- All forms of HBV are forms of abuse and will be treated and escalated as such.
- Staff will be alert to the signs of HBV, including concerns that a child is at risk of HBV, or has already suffered from HBV, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

#### 24. Forced marriage

- For the purpose of this policy, a **“forced marriage”** is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Forced marriage is classed as a crime in the UK.
- As part of HBV, staff will be alert to the signs of forced marriage including, but not limited to, the following:
  - Becoming anxious, depressed and emotionally withdrawn with low self-esteem
  - Showing signs of mental health disorders and behaviours such as self-harm or anorexia
  - Displaying a sudden decline in their educational performance, aspirations or motivation
  - Regularly being absent from school
  - Displaying a decline in punctuality
  - An obvious family history of older siblings leaving education early and marrying early
- If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL and local safeguarding procedures will be followed – this could include referral to MASH, the police or the Forced Marriage Unit.

#### 25. County lines criminal activity

- For the purpose of this policy, **“County lines criminal activity”** refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.

- Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.
- Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.
- The DSL will consider referral to the National Referral Mechanism on a case-by-case basis.
- Indicators that a pupil may be involved in county lines activity include the following:
  - Persistently going missing or being found out of their usual area
  - Unexplained acquisition of money, clothes or mobile phones
  - Excessive receipt of texts or phone calls
  - Relationships with controlling or older individuals or groups
  - Leaving home without explanation
  - Evidence of physical injury or assault that cannot be explained
  - Carrying weapons
  - Sudden decline in school results
  - Becoming isolated from peers or social networks
  - Self-harm or significant changes in mental state.
  - Parental reports of concern.

## **26. Pupils with family members in prison**

- Pupils with a family member in prison will be offered pastoral support as necessary.
- They will receive a copy of '[Are you a young person with a family member in prison](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

## **27. Pupils required to give evidence in court**

- Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.
- Pupils will also be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

## **28. Alternative provision**

- The school will remain responsible for a pupil's welfare during their time at an alternative provider.
- When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

## **29. Work experience**

- When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place.
- Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

### **30. Homestay exchange visits**

#### **School-arranged homestays in UK**

- Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay.
- In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.
- Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host.
- In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

#### **School-arranged homestays abroad**

- The school will liaise with partner schools to discuss and agree the arrangements in place for the visit.
- The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.
- The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange.
- Pupils will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

#### **Privately arranged homestays**

- Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

### **31. Private fostering**

- Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

### **32. Managing referrals**

#### **To the DSL and DSL deputies**

- 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/parent to keep secrets.
  - Child protection information will be stored and handled in line with Data Protection Act 1998 principles. Information is:
    - processed for limited purposes;
    - adequate, relevant and not excessive;
    - accurate;
    - kept no longer than necessary ;
    - processed in accordance with the data subject's rights and
    - secure.
- Record of Concern forms (Yellow forms) and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals on a need to know basis.
- Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers

or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

### To external agencies

- The reporting and referral process outlined in [Appendix B](#) will be followed accordingly.
- All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed.
- When making a referral to MASH or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.
- The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved.
- The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.
- Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made.  
**Where this information is not forthcoming, the referrer will contact either the assigned social worker or MASH for more information. The DSL will also utilise the 'escalation and resolution' policy where necessary.**
- The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS.
- Where CSCS decide that a statutory investigation is not appropriate, the school will give consideration to referring the incident again if it is believed that the pupil is at risk of harm.
- Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will give consideration to the use of other support mechanisms, such as early help and pastoral support.
- At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so.
- Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm.
- The school will work closely with parents to ensure that the pupil, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

### 33. Communication and confidentiality

- All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.
- Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents.
- Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.
- Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.
- During disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

- Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime.
- Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others.
- Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.
- Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved.
- Discussions with parents will not take place where they could potentially put a pupil at risk of harm.
- Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.
- Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, etc., with the reasons behind decisions being explained and the available support discussed.
- External agencies will be invited to these discussions where necessary.
- Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.
- Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

#### **34. Concerns about staff members and safeguarding practices**

Staff who are concerned about the conduct of a colleague - including visiting professionals and volunteers - towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague's career. All staff must remember that the welfare of the child is paramount. The school's **whistleblowing** policy enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

- If a staff member has concerns about another member of staff, it will be raised with the headteacher.
- If the concern is with regards to the headteacher, it will be referred to the chair of governors - the information in an envelope marked 'Strictly Private and Confidential to be opened by addressee only - For the attention of Chair of Governors' and ask for it to be given to the Clerk to the Governors. The Clerk to the Governors will immediately notify the Chair of Governors of the receipt of an envelope marked 'Strictly Private and Confidential to be opened by addressee only - For the attention of Chair of Governors' so that they can receive it. Only the Chair of Governors will be made aware of the envelope.
- If the allegation is against the Chair of Governors then staff should contact the Diocesan Director of Education
- Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.
- If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).



- Any allegations of abuse made against staff members will be dealt with in accordance with the school's Allegations of abuse Against Staff Policy and referred to the LADO.

### **35. Dealing with allegations of abuse against staff**

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. However, in some cases staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension the school will provide support and a named contact for the member of staff.

**As stated above, all allegations against staff should be reported to the headteacher. Allegations against the headteacher should be reported to the chair of governors. Staff may also report their concerns directly to the Police or Children's Social Care via the MASH if they believe direct reporting is necessary to secure action.**

- All allegations will be dealt with in line with the school's Allegations of abuse Against Staff Policy and referred to the LADO.
- Where an allegation is substantiated, and the individual is dismissed or resigns, the school will refer it to the DBS. They will also consider referring the matter to the TRA for consideration for a prohibition order.

### **36. Training**

- Staff members will undergo annual safeguarding and child protection training, which will be regularly updated or whenever there is a change in legislation.
- Training will cover, at a minimum:
  - How to identify safeguarding concerns and specific safeguarding issues
  - Their duty in the prevention of terrorism
  - What to do if a child discloses a concern
  - The procedure to follow when reporting concerns
  - Information sharing restrictions and protocols
  - The early help processes
  - The referral process and their role in assessments
  - Who to contact for support
  - Whistleblowing procedures within safeguarding
  - The school's Behavioural Policy, Child Protection and Safeguarding Policy and Staff Code of Conduct
  - The safeguarding response to children who go missing from education
  - The name and role of the DSL and any deputies
  - The issues surrounding sexual violence and sexual harassment.
  - Contextual safeguarding.
- Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

- The DSL and deputy DSLs will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.
- The DSL and deputy DSLs will also undergo Prevent awareness training every two years which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff.
- The DSL and their deputies will undergo online safety training to help them recognise the additional risks that pupils with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support pupils with SEND to stay safe online
- Online training will also be conducted for all staff members as part of the overall safeguarding approach.
- Supply staff and other visiting staff will be given the school's **Information & Safeguarding Leaflet** when they sign in at the school's main reception.

### 37. Safer recruitment

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.
- The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

### Pre-employment checks

The governing board will assess the suitability of prospective employees by:

- Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available.
- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
- Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the [TRA Teacher Services' System](#).
- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.
- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the [Gov.UK](#) website will be followed.
- If the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.
- Checking professional experience, QTS and qualifications as appropriate using Teacher Services.
- **An enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.**

### **Internal candidates**

- If an individual moves from a position within the school that did not involve the provision of education to one that does, it will be treated as if the individual were a new member of staff and all required pre-appointment checks will be carried out.
- References from internal candidates will always be scrutinised before appointment.

### **ITT candidates (initial teacher training)**

- Where applicants for ITT are salaried by the school, the school will ensure that enhanced DBS checks with barred list information are carried out.
- Written confirmation will be obtained to ensure that an enhanced DBS certificate and barred list check has been carried out for all fee-funded trainees.

### **Governors**

- An enhanced DBS check will be carried out for each member of the governing board. Where a governor also engages in regulated activity, a barred list check will also be requested. The school will also contact the TRA using Teacher Services to check if a proposed governor is barred as a result of being subject to a section 128 direction. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check.

### **Those who have lived or worked outside of the UK**

- For those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.

### **Barred list check**

- An enhanced DBS check may be requested for anyone working in school that is not in regulated activity but does not have a barred list check.
- If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment.
- Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

### **References**

- References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.
- References will only be accepted from a senior person and not from a colleague.
- References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.
- References will be obtained prior to interviews taking place and discussed during interviews.
- Open testimonials will not be considered.
- Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

- Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

### **Volunteers**

- No volunteer will be left unsupervised with a pupil or allowed to work in regulated activity until the necessary checks have been obtained.
- An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.
- Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.
- A supervised volunteer who regularly teaches or looks after children is not in regulated activity.
- The school will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.
- Unless there is cause for concern, the school will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.
- A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

### **Contractors**

- The school will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.
- Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.
- Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the school.

### **Data retention**

- DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.
- A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

### **Referral to the DBS**

- The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity.

### **38. Single central record (SCR)**

The school keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school.

- The following information is recorded on the SCR:
  - An identity check

- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A section 128 check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- For supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received, which indicates that all of the necessary checks have been conducted and the date that confirmation was received.
- If any checks have been conducted for volunteers, this will also be recorded on the SCR.
- If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

### **39. Site security**

Visitors to the school, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations to ensure children in school are kept safe, and those staying in site are given an information leaflet about safeguarding in our school. The Headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

### **40. Mobile phone and camera safety**

- Staff will use their professional judgement in emergency situations.
- Mobile devices will not be used to take images or videos of pupils or staff in any circumstances.
- The sending of inappropriate messages or images from mobile devices is strictly prohibited.
- Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy.
- The DPO (Data Protection Officer) will oversee the planning of any events where photographs and videos will be taken.
- Where photographs and videos will involve LAC pupils, adopted pupils, or pupils for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved.
- The DSL will, in known cases of a pupil who is an LAC or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.

### **41. Sports clubs and extracurricular activities**

- Clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.
- Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of pupils.
- Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

- All national governing bodies of sport that receive funding from either Sport England or UK Sport, must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

#### **42. Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures. The anti-bullying policy is on the school's web-site and the subject of bullying is addressed at regular intervals in PSHE education. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the headteacher and the DSL will consider implementing early help or child protection procedures.

#### **43. Safeguarding Staff**

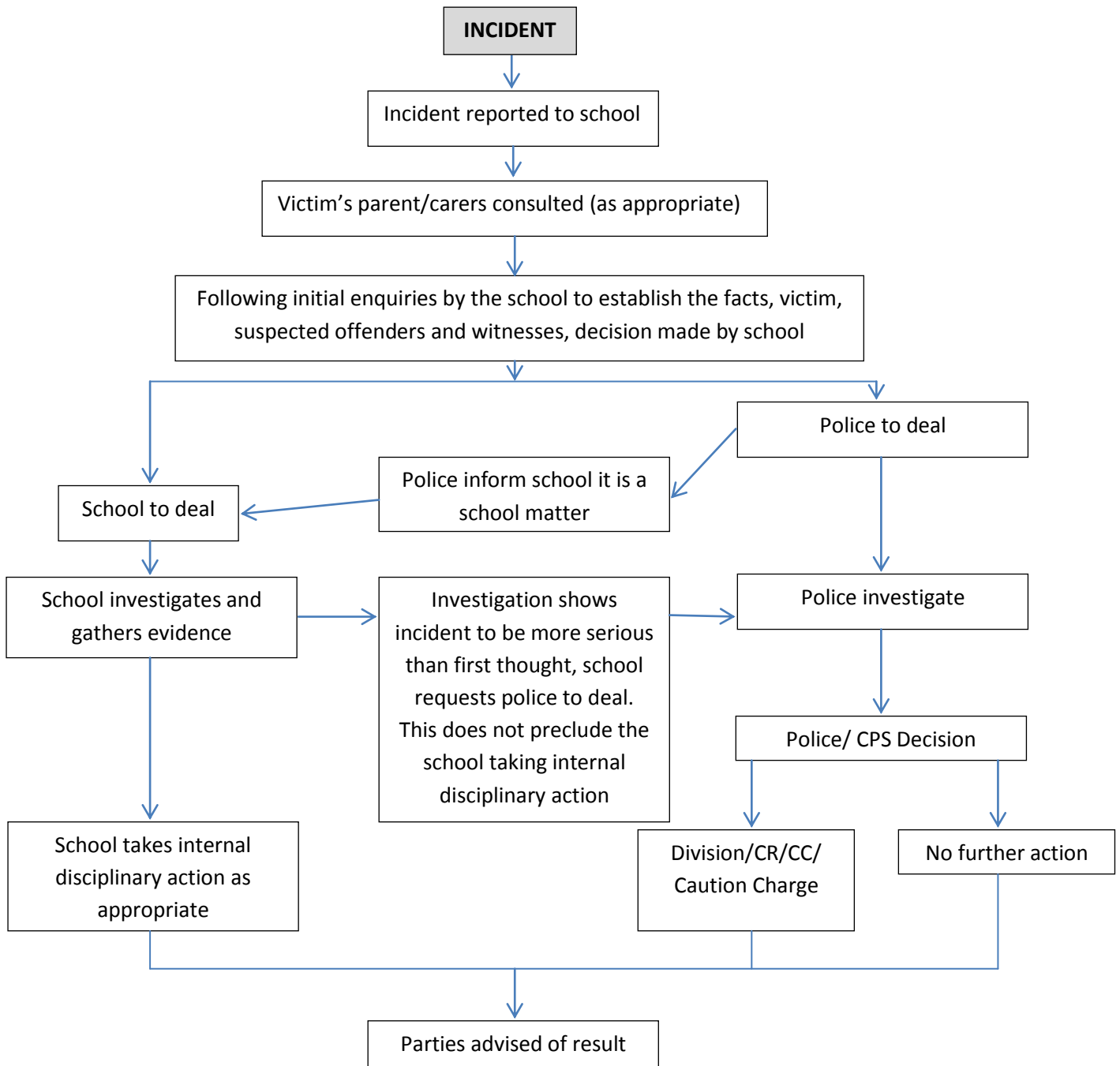
All staff, as well as having their duty to safeguard young people, should be mindful of steps required we all take, to safeguard ourselves. These will include:

- Staff members should make every effort to ensure they are not alone in rooms with students after school hours; if it is not possible or a disclosure is being made they must leave the door open.
- Staff have a duty to report concerns via the yellow form to the DSL or designated member of the safeguarding team, as laid out in point 32 of this policy.
- Staff also have a duty to ensure their privacy settings on social media platforms are set to the highest level, as set out in the Acceptable User Policy.

As always, if staff members have questions or concerns with this area, they need to see our DSL.

#### **44. Police Involvement**

Whether to involve police in any incident at school will be a decision made by the Headteacher. The following diagram, on page 39, may be useful to inform the subsequent process.



## Appendix A

### **If a member of staff or volunteer is concerned about a pupil's welfare**

There will be occasions when staff may suspect that a pupil may be at risk but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

Staff should use the same Record of Concern form (Yellow form) to record these early concerns. If the pupil does begin to reveal that they are being harmed, staff should follow the advice below.

Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL.

Concerns which do not meet the threshold for child protection intervention will be managed through the Early Help/CAF process as in section 7 of this policy.

### **If a pupil discloses to a member of staff or volunteer**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen but if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with pupils staff will:

- allow them to speak freely;
- remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
- not be afraid of silences – staff must remember how hard this must be for the pupil;
- **under no circumstances** ask investigative questions – such as how many times has this happened, whether it happens to siblings too, or what the pupil's mother thinks about all this; (**however**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. when did this happen, where did this happen?)
- at an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong;
- tell the pupil what will happen next;
- let them know that someone (either you or another named person, e.g. the DSL) will come to see them before the end of the day;
- report verbally to the DSL;
- write up their conversation as soon as possible on the **Record of Concern form** (Yellow form) and hand it to the DSL; and

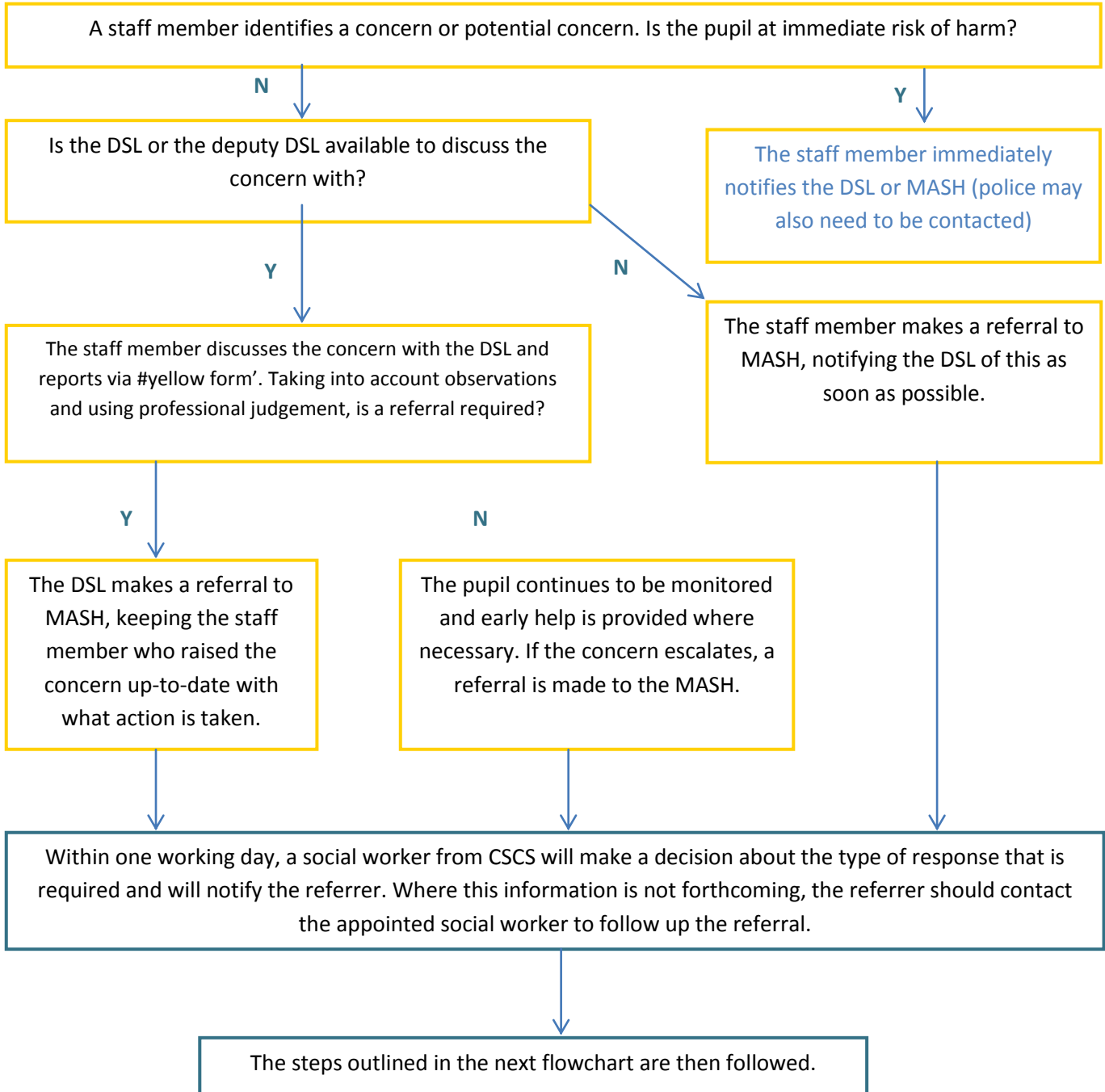


- seek support if they feel distressed or need to debrief.

## Appendix B

The actions taken by the school are outlined in yellow, whereas actions taken by another agency are outlined in blue.

### Before a referral is made



Once a referral has been made, a social worker from MASH or CSCS will notify the referrer that a decision has been made and one of the following responses will be actioned.

The pupil is in need of immediate protection.

Where the pupil is at risk of significant harm but is not in immediate danger, a strategy discussion is held.

No formal assessment is needed.

Where appropriate to do so, the DSL and staff member who raised the concern may be consulted during these stages to ensure that all areas of concern are addressed.

The DSL supports the initial staff member to liaise with other agencies to arrange an early help assessment and appropriate support.

Appropriate emergency action is taken by the social worker, police or NSPCC.

A Child in Need assessment is completed within 45 working days.

Within 15 working days of the strategy discussion, an initial child protection conference is held.

A child protection plan is potentially required.

The type of support needed is identified, arranged through multi-agency liaison and provided effectively.

Staff keep the pupil's circumstances under review and re-refer if appropriate to ensure circumstances improve – the pupil's best interests always come first.

If the child's situation does not appear to be improving, the DSL should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.