



# Rosh Pinah Primary School

## **Child Protection and Safeguarding Policy**

**Date of Ratification: December 2021**

**Date for Review: September 2022**

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## Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Headteacher	Jill Howson	020 8958 8599
Designated Safeguarding Lead (DSL)	Sarmila Roy	020 8958 8599
Deputy DSL	Hayley Ordman	020 8958 8599
Barnet Local Authority Designated Officer (LADO)	Shrimatie Bissessar	020 8359 4066
Barnet Safeguarding Children Board		020 8359 4519
Barnet Children's Social Care		020 8359 4066
Chair of Governors	Andrew Rotenberg	020 8958 8599
Nominated Safeguarding Governor	Elizabeth Harris	020 8958 8599
Channel Helpline		020 7340 7264

## 1. Aims

The school aims to ensure that:

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

## 2. Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook \(Oct 2020\)](#). We comply with this guidance and the arrangements agreed and published by our 3 Local Safeguarding Partners.

This Policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and Local Authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the Police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [Voyeurism \(Offences\) Act 2019](#) which is commonly known as the [Upskirting Act](#)
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

### 3. Definitions

#### **Safeguarding and promoting the welfare of children means:**

- Protecting children from maltreatment
- Preventing impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcome.

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

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

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

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

The following **Three Safeguarding Partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Local Authority (LA)
- A Clinical Commissioning Group for an area within the LA
- The Chief Officer of Police for a Police area in the LA area.

**Harmful Sexual Behavior** 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.

**Sexual Harassment** is used 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.

**Sexual Violence** encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

**Upskirting** refers to the act of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks (with or without clothing). Despite the name, anyone (including both pupils and teachers), and any gender, can be a victim of Upskirting.

**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.

## 4. Equality Statement

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

- We give special consideration to children who:
  - Have special educational needs (SEN) or disabilities or health conditions ([see section 11](#))
  - Are young carers
  - May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
  - Have English as an additional language
  - Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
  - Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
  - Are asylum seekers
  - Are at risk due to either their own or a family member's mental health needs
  - Are looked after or previously looked after ([see section 12](#))
  - Are missing from education
  - Whose parent/carer has expressed an intention to remove them from school to be educated at home.

## 5. Roles and Responsibilities

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

### 5.1 All staff

- All staff who work directly with children will read and understand Part 1, Annex A and B of the Department for Education's Statutory Safeguarding Guidance, [Keeping Children Safe in Education \(2021\)](#) and review this guidance at least annually
- All staff who don't work directly with children will read and understand Part 1 (condensed version of part 1) and Annex A and B ( of the Department for Education's Statutory Safeguarding Guidance, [Keeping Children Safe in Education \(2021\)](#) and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this Child Protection & Safeguarding Policy, the Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and Deputy, the Behaviour Policy, the Online Safety Policy and the safeguarding response to children who go missing from education
- The Early Help Process (sometimes known as the Common Assessment Framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

- The process for making referrals to Local Authority Children’s Social Care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

**Appendix 4** of this policy outline in more detail how staff are supported to do this.

## **5.2 The Designated Safeguarding Lead (DSL)**

The DSL is a member of the Senior Leadership Team. The DSL takes lead responsibility for Child Protection and wider safeguarding.

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

The DSL can also be contacted out of school hours if necessary by email or phone.

When the DSL is absent, the Deputy DSL will act as cover. If in exceptional circumstances, the Designated Safeguarding Lead (or Deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the Senior Leadership Team and/or take advice from Local Children’s Social Care. In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or Deputy) as soon as is practically possible. During out of school hours if the DSL and Deputy are not available the Headteacher or any other member from the Senior Leadership Team will act as cover.

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

- Manage referrals
- Understand and keep up-to-date with local safeguarding arrangements
- Refer cases of suspected abuse to the Local Authority children’s Social care as required
- Support staff who make referrals to Local Authority Children’s Social Care
- Refer cases to the Channel Programme where there is a radicalisation concern as required
- Support staff who make referrals to the Channel Programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the Police as required

Work with others to:

- Act as a point of contact with the Three Safeguarding Partners
- Liaise with the Headteacher to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations
- As required, liaise with the ‘Case Manager’ and the Designated Officer(s) at the Local Authority for child protection concerns in cases which concern a staff member
- Liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs, Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- Act as a source of support, advice and expertise for all staff.

The Designated Safeguarding Lead and Deputy should also work with other agencies in line with Working Together to Safeguard Children. NSPCC- ‘When to Call the Police’ Guidance should help the DSL understand when they should consider calling the police and what to expect when they do.

The full responsibilities of the DSL and the Deputy DSL are set out in their job description.

### 5.3 The Governing Body

The Governing Body will approve this Policy at each review and has a duty to:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- Appoint a link Governor to monitor the effectiveness of this Policy in conjunction with the full Governing Body. This is always a different person from the DSL
- Ensure that the Chair of Governors will act as the 'Case Manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see Appendix 3)
- All Governors will read 'Keeping Children Safe in Education 2021'
- Be aware of the School's Local Safeguarding Arrangements.

**Section 19 has information on how Governors are supported to fulfil their role.**

### 5.4 The Headteacher

The Headteacher is responsible for the implementation of this Policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this Policy, as part of their induction
  - Understand and follow the procedures included in this Policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this Policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Being aware of the School's Local Safeguarding Arrangements
- Ensuring that all staff undertake appropriate Safeguarding and Child Protection training and update the content of the staff training regularly
- Acting as the 'Case Manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person.

## 6. Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, it is important for Governing Bodies and Headteachers to recognise the importance of information sharing between practitioners and local agencies.

Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the Local Authority Children's Social Care.

It is important that the Governing Body and Headteacher are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Governing Body and Headteacher should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'
- Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information

without consent where there is good reason to do so, and that the sharing of information will enhance then safeguarding of a child in a timely manner

- Not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

## 7. Confidentiality

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests. The Government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information as follows:

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or Deputy):

- The Headteacher, DSL or Deputy DSL will only disclose any child protection information about a pupil to other members of staff on a need to know basis
- We will undertake to share our intention to refer a child to the MASH with parents/carers unless by doing so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt we will consult with MASH
- All staff must comply with the professional standards governing confidentiality and information sharing
- Confidentiality is also addressed in this policy with respect to record-keeping in [section 17](#), and allegations of abuse against staff in [Appendix 3](#).



## 8. Recognising Abuse and Taking Action

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

### 8.1 If a child is suffering or likely to suffer harm, or in immediate danger you should:

- Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral**
- Tell the DSL ([see section 5.2](#)) as soon as possible if you make a referral directly
- Use the following link to report child abuse to your Local Council <https://www.gov.uk/report-child-abuse-to-local-council>.

Referrals or requests for advice can be made by:

- Calling the Multi-Agency Safeguarding Hub (MASH) on 020 8359 4066 for any urgent welfare concerns about children or young people that require immediate response. The MASH team are available from Monday to Thursday at 9am to 5.15pm and Friday at 9am to 5pm
- Emailing the Multi-Agency Safeguarding Hub (MASH) – [mash@barnet.gov.uk](mailto:mash@barnet.gov.uk)
- Phoning outside the hours to the Emergency Duty Team on 020 8359 2000 to report any concern that need an immediate response
- Completing a safeguarding concern referral form if you are worried that a child may be suffering, or may be at risk of harm.

### 8.2 If a child makes a disclosure to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the conversation and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly ([see 8.1](#)) and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in [Appendix 4](#).

**Any teacher** who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures ([see section 8.1](#)).

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

**Any member of staff** who suspects a pupil is at risk of FGM or suspects that FGM has been carried out must speak to the DSL and follow the Local Authorities Safeguarding Procedures.

#### **Local Authority Safeguarding Procedure for reporting FGM**

- Contact the MASH Team on 020 8359 4066 to speak to a social worker or email [mash@barnet.gov.uk](mailto:mash@barnet.gov.uk) (see section 8.1 – referrals).

#### **Other Support**

- Call NSPCC on 0808 800 5000 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or fill in their online form.

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

**Figure 1 on page 14 illustrates the procedure to follow if you have any concerns about a child's welfare.**

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children's Social Care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to Local Authority Children's Social Care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

#### **Early Help**

Early Help means providing support as soon as a problem emerges, at any point in a child's life.

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

The DSL will keep the case under constant review and the school will consider a referral to Local Authority Children's Social Care if the situation does not seem to be improving.

#### **Early help - referring in Barnet**

- Referral through MASH
- Referral using Universal Plus form
- 0-19 Early Help Hubs
- Multi-agency information sharing and problem solving
- Case shared by relevant professionals
- Anyone can go to observe MASH or an Early Help Hub in action.

#### **Referral**

If it is appropriate to refer the case to Local Authority Children's Social Care or the Police, the DSL will make the referral or support you to do so.

If you make a referral directly ([see section 8.1](#)) you must tell the DSL as soon as possible.

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

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

## **Stages of Resolution**

### **Stage One - Discuss with the other worker**

The people who disagree have a discussion to resolve the problem. This discussion must take place as soon as possible and could be a telephone conversation or a face to face meeting. It should be recognised that differences in status and/or experience may affect the confidence of some workers to pursue this unsupported.

### **Stage Two: Escalate**

Refer to the following for how to escalate an issue in the case of:

- Barnet Police
- Barnet Schools
- Barnet Family Services
- Barnet Health Agencies.

### **Barnet Police:**

#### **First line of Escalation**

- An Inspector or the Duty Officer in charge of the uniform response shift (24/7). If the Police Team dealing is not Barnet, the Duty Officer would be expected to deal with this on their behalf. The contact details for them will be available from the officer dealing with the case / incident.

#### **Second line of Escalation**

- Between 7:00am and 9:00pm, the on duty / on call member of the 'Senior Leadership Team' for Barnet. Their contact details will be available via the Duty Officer. This may within office hours go to the Safeguarding lead
- Between 9:00pm and 7:00am, the Night Duty Superintendent who will be covering all of North London. The contact details will be available via the Duty Officer.

#### **Third line of Escalation**

- The Borough Commander for Barnet Police.

### **Barnet Schools:**

- Where it is believed that the response from a school does not meet the safeguarding requirements for a child, the appropriate person to escalate to is, in the first instance, the Headteacher
- In schools where the Headteacher is also the Designated Safeguarding Lead, complaints should be directed to the Safeguarding Governor or Chair of Governors
- If concerns have still not been resolved the school complaints/escalation procedure should be utilised. In cases, where the matter is urgent or if the school is not responding in accordance with its policy contact either the Barnet Cambridge Education School Safeguarding Officer or the School's Learning Network Inspector.

### **Barnet Family Services:**

- For children accessing Early Help Services, professionals should raise concerns at Team Around the Child Meetings or other Multi-Agency Planning Meetings. For children subject to Child in Need, Child Protection or Child in Care Plans, concerns can be shared at the Child's Multi-Agency Review Meetings or via the Independent Reviewing Officer or Conference Reviewing Officer. Professionals should always consider the impact of professional disagreements on families attending meetings.

The following stages of resolution and escalation should be followed for children referred to, or open to Barnet Family Services.

- **Initial Resolution**

Open Cases: by contacting the allocated social worker or lead professional

New Referrals: by contacting the MASH Social Worker

Out of Hours: by contacting the Emergency Duty Team (5pm – 9am Monday to Friday, weekends and Bank Holidays).

- **First Line of Escalation**

Open Cases: by contacting the allocated social worker's or lead professional's Team Manager

New Referrals: by contacting the MASH Head of Service

Out of Hours: by contacting the Head of Service on Duty (5pm – 9am Monday to Friday, weekends and Bank Holidays).

- **Second Line of Escalation**

Open Cases: by contacting the service area Head of Service

New Referrals: by contacting the MASH Head of Service.

- **Third Line of Escalation**

Open Cases or New Referrals: by contacting the relevant Family Services Operational Director.

#### **Barnet Health:**

- Where it is believed that the response from a Health Agency does not meet the safeguarding requirements for a child, the appropriate person to escalate is in the first instance the Head of Safeguarding for the Provider organisation concerned and the Designated Nurse and Doctor NHS Barnet Clinical Commissioning Group
- If an acute safeguarding situation occurs out of hours, which requires an immediate health assessment the Duty Paediatric Team at the Hospital local to the child should be contacted. For Barnet Hospital, the Duty Paediatric Team can be contacted through the Hospital switchboard on 0208 216 4600.

#### **Stage Three: Resolution by Senior Leaders**

- If after following the above stages the matter cannot be resolved satisfactorily, escalate to the Director of Children's Services, Borough Commander or Chief Operating Officer for the Clinical Commissioning Group, also notify the Safeguarding Children Partnership via: [BSCP@barnet.gov.uk](mailto:BSCP@barnet.gov.uk)
- The independent chair can be called upon to mediate on behalf of any of the partners where senior leaders are unable to resolve a situation
- There is a requirement for the record of any escalation to be placed on a child's record.

#### **Additional Notes**

- The Safeguarding Children Partnership Leadership Forum will consider issues escalated and any trends or patterns as well as actions which should be taken to keep children safe
- Where issues are raised with partners from other authorities, including other local authorities, please follow the procedures as identified across Stage One. If you are unable to resolve the issue the Barnet Safeguarding Children Partnership can be approached to liaise with the relevant Senior Leaders in the other Authority.

#### **8.5 If you have concerns about Extremism**

If a child is suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or seek advice from Local Authority Children's Social Care. Make a referral to Local Authority Children's Social Care directly, if appropriate ([see 'Referral' above](#)).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the Government's Programme for identifying and supporting individuals at risk of being drawn into terrorism, or the Local Authority Children's Social Care Team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

## 8.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.4. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

### Referral Process

- Pupils struggling with Social, Emotional and Mental Health needs are referred to Barnet Mental Health Services via the Universal Plus form on the Barnet website
- Pupils are also referred to CAMHS (Children and Adolescent Mental Health Service)
- Children are referred to the different mental health services by their GP.

### Mental Health Support Offered by BICS (Barnet Integrated Clinical Service)

After the referral is accepted an assessment is conducted by the mental health practitioners to identify the appropriate support available. This might be using their online resources, attending one of their groups or workshops or either individual or family sessions with a BICS (Barnet Integrated Clinical Service) practitioner. BICS provides mild to moderate children, young people, and family mental health (CYP MH) clinical services across the borough. BICS is made up of low (mild) intensity and high (moderate) intensity multidisciplinary clinical teams of clinical and operational managers, clinicians and non-clinical staff that are integrated in schools, GP surgeries, the community, Early Help, Social Care and Youth Offending Services.

**Barnet Integrated Clinical Services (BICS) Individual Interventions:** They accept referrals from individuals, families and professionals and can offer both virtual and face-to-face support either in school or in the community. For some families, an individual intervention is most helpful where children work with one practitioner towards specific goals. Individual work refers to one family working with one practitioner and this could be for parents only, child only, or a combination depending on age and need.

**Barnet Integrated Clinical Services (BICS) Family Therapy Clinic:** They accept referrals to these clinics from children and family services. They offer therapeutic space for families, children and young people to work on specific concerns that have interrupted family life.

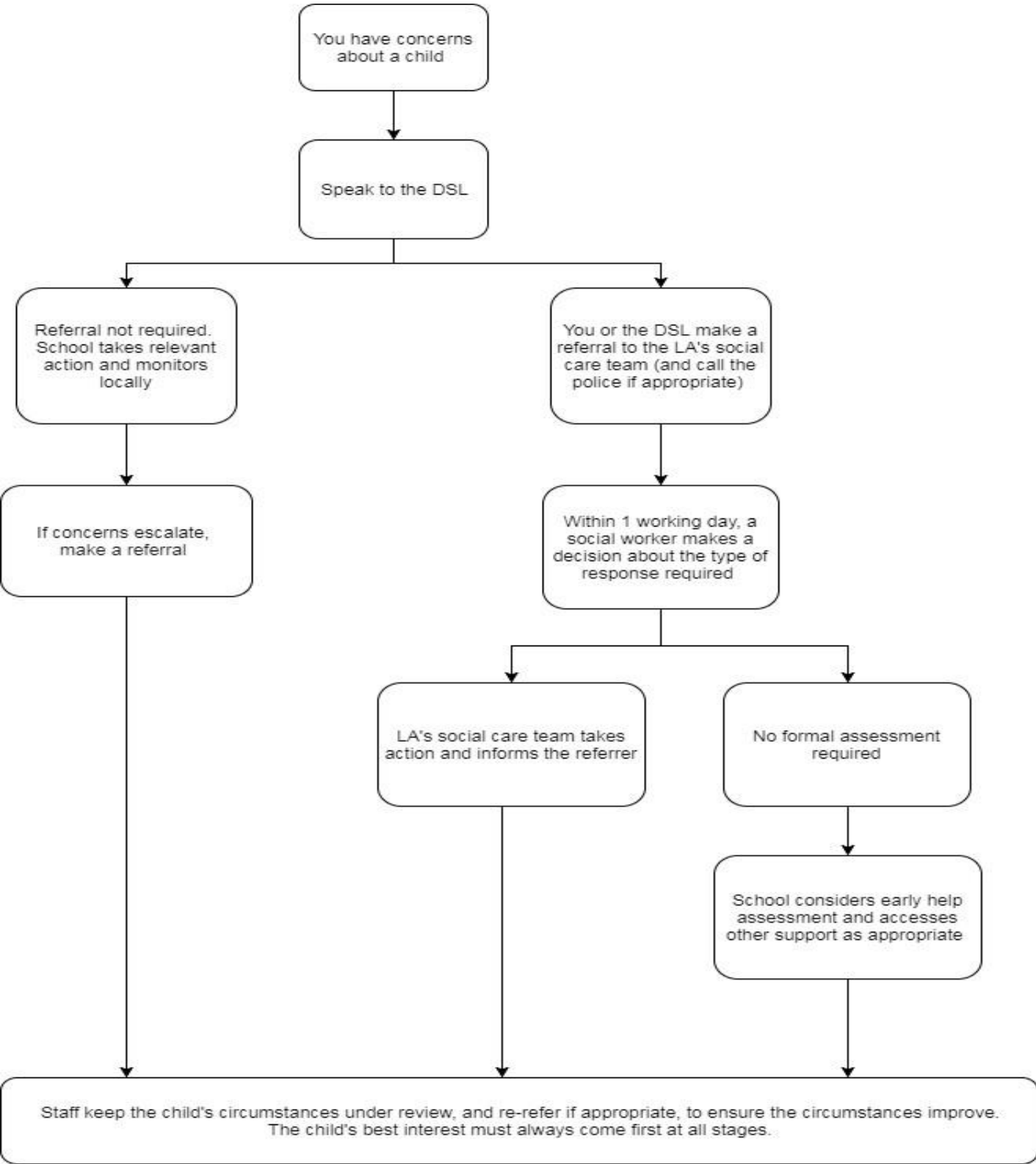
**Groups and Workshops:** Alongside individual and family interventions, a number of groups and workshops are on offer for children, young people, parents and carers.

**Online Resources Podcast:** Barnet Mental Health Team have released Podcast episodes in managing relationship challenges in the family as part of adapting to the gradual lifting of lockdown.

### CAMHS (Child and Adolescent Mental Health Service)

Child and Adolescent Mental Health Services (CAMHS) provides assessment, treatment and support of the mental health, behavioural and emotional wellbeing needs of children and young people aged from 0-17 years.

**Figure 1: Procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) Note –if the DSL is unavailable, this should not delay action (see section 8.4).**



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

If you have concerns about a member of staff (including supply staff, volunteers or contractor) or an allegation is made about a member of staff (including a supply staff, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the Chair of Governors. The Headteacher/Chair of Governors will then follow the procedures set out in [Appendix 3](#) if appropriate. Where there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply staff, volunteer or contractor) to the Headteacher, report it directly to the Local Authority Designated Officer (LADO).

As the school is an Early Years provider, where appropriate, the school will inform Ofsted of the allegation and actions taken ([see Appendix 3 for more detail](#)).

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

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

We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

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

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

[See Appendix 4 for more information about peer-on-peer abuse.](#)

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the Local Authority Children’s Social Care Team and follow its advice, as well as the Police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate.

### **Creating a supportive environment in school and minimising the risk of peer-on-peer abuse**

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems

- Develop pupils awareness through Assemblies, Anti- Bullying Week activities, talks and workshops by the NSPCC and Streetwise, through PSHE , RSHE and cross curricular activities across the curriculum
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
  - That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns.

## 8.9 Sharing of nudes and semi-nudes (‘sexting’)

### Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’) you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved.

You **should**:

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

### Initial Review Meeting

Following a report of an incident, the DSL will hold an Initial Review Meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the Police and/or Children’s Social Care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services



- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/ carers should be involved).

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

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

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

**Further review by the DSL**

If at the initial review stage a decision has been made not to refer to Police and/or Children's Social Care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

**Informing Parents**

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

**Referring to the Police**

If it is necessary to refer an incident to the police call 999 if the child is at immediate risk, or call [the police on 101](#) if you think a crime has been committed. **The School Safe Procedure for Primary Schools is displayed in the School Office.**

**Recording Incidents**

All incidents of sharing nudes and semi-nudes, and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in [section 17](#) of this Policy also apply to recording these incidents.

**Curriculum coverage**

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

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

Pupils also learn the strategies and skills needed to manage:

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

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

### **8.10 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Pupils will be made aware of their reporting systems and processes e.g. through their RSHE curriculum
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

## **9. Notifying Parents and Carers**

- Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
- Other staff will only talk to parents about any such concerns following consultation with the DSL.
- If we believe that notifying the parents would increase the risk to the child, we will discuss this with the Local Authority Children's Social Care Team before doing so.
- In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## **10. Multi – Agency Working**

Schools have a pivotal role to play in multi-agency safeguarding arrangements. The Governing Body and Headteacher will ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children. New Safeguarding Partners and Child Death Review Partner arrangements are now in place.

### **Locally:**

- The Three Safeguarding Partners will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs
- The Three Safeguarding Partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role, they must set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement that the Three Safeguarding Partners consider may be required to safeguard and promote the welfare of children regarding local need
- The Three Safeguarding Partners will have set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements
- The Three Safeguarding Partners should make arrangements to allow all schools in the local area to be fully engaged, involved and included in safeguarding arrangements
- It is expected that the Three Safeguarding Partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

## **11. Pupils with Special Educational Needs, Disabilities or Health Issues**

We recognise that pupils with special educational needs (SEN) and disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

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

- Mentoring support offered by our Family Liaison Officer to children who are experiencing a range of behavioural or social and emotional difficulties that have become a barrier to learning
- Supporting children one-to-one or within small groups to help them develop coping strategies, enhance motivation and self-esteem and raise their aspirations
- Working with external agencies e.g. Trailblazer & Barnet Primary Mental Health Team. Councillors come into the school to work with children to support their mental health and emotional well-being.

## **12. Looked After Children and Previously Looked After Children**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Governing Body and the Headteacher should ensure that staff have the skills, knowledge and understanding to keep looked after children safe. In particular, they should:

- Ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility
- Ensure the appropriate staff have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her
- Ensure that the Designated Safeguarding Lead should have details of the child's social worker and relevant virtual school heads.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

### **12.2 The Designated Teacher**

Governing bodies of maintained schools must appoint a designated teacher and should work with local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher must have appropriate training and the relevant qualifications and experience. As part of their role, the designated teacher will:

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

## **13. Pupils with a Social Worker**

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

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

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

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

## **14. Online Safety and the use of Mobile Technology**

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

To address this, our school aims to:

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

### **The 4 key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

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

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risk of online radicalization. All staff members will receive refresher training at least once each academic year
- Educate Parents/Carers about online safety via our website, communication sent directly to them and during Parents' Evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras

- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all Staff, Pupils and Parents/Carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

The school will adhere to the terms of the E-Safety Policy at all times. Photographs and videos of pupils will be carefully planned before any activity with particular regards to consent and adhering to the School's Data Protection Policy. 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.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website

## **15. Opportunities to Teach Safeguarding**

Governing body and Headteacher will ensure that children are taught about safeguarding, including online safety. The School considers this as part of providing a broad and balanced curriculum.

This includes covering relevant issues for schools such as supporting pupils to be themselves at school, e.g. if they are LGBTQ through Relationships Education and Health Education which is compulsory from September 2020.

## **16. Complaints and Concerns about School Safeguarding Policies**

### **16.1 Complaints against staff**

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

### **16.2 Whistle-blowing**

Refer to the School's Whistle-Blowing Policy that covers concerns regarding the way the School safeguards pupils including poor or unsafe practice, or potential failures.

As an Early Years provider we will notify Local Children's Social Care Services and, in emergencies, the Police if we have concerns about children's safety or welfare.

## **17. Record-Keeping**

We will hold records in line with our data retention schedule. [Refer to the School's Data Retention Policy for further detail.](#)

- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them
- Safeguarding records relating to individual children will be retained until the individual reaches the age of 25

- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

**Record-keeping arrangements:**

- Records are paper-based and electronically saved in Child Protection and Online Management System (CPOMS). The DSL, Deputy DSL and the Headteacher have access to the safeguarding information in CPOMS.
- Paper based records are securely locked in the Headteacher's Office.

**Records will include:**

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

In addition:

- [Appendix 2](#) sets out our procedures on record-keeping specifically with respect to recruitment and pre-employment checks
- [Appendix 3](#) sets out our procedures on record-keeping with respect to allegations of abuse made against staff.

## **18. 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 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 agency and third-party 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 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.

## **19. Training**

### **19.1 All staff**

- All staff members will undertake Safeguarding and Child Protection Training at induction, including training on Whistle-Blowing Procedures, to ensure they understand the School's Safeguarding Systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be updated annually and will be in line with advice from The Three Safeguarding Partners.
- All staff will have training on the Government's Anti-Radicalisation Strategy, 'Prevent', to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

- Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- Volunteers will receive appropriate training, if applicable.

**19.2 The DSL and Deputy** will undertake Child Protection and Safeguarding Training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals **and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).** They will also undertake Prevent Awareness Training.

**19.3 Governors** need to receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the Chair of Governors may be required to act as the ‘case manager’ in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

**19.4 Recruitment – interview panels** need to have at least one person conducting any interview for a post at the school will have undertaken Safer Recruitment Training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

**19.5 Staff who have contact with pupils and families** will have supervisors which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## 20. Monitoring Arrangements

This policy will be reviewed annually by the DSL. At every review, it will be approved by the full Governing Body.

## 21. Links with other Policies

This Policy links to the following Policies and Procedures:

- Behaviour Management
- Staff Code of Conduct
- Complaints
- Health and safety
- Attendance
- Online Safety
- Equality
- Sex and Relationship Education
- Medicines in School
- Curriculum Policies
- Privacy notices
- Mobile Phone
- Whistle Blowing
- IT – Acceptable Use Agreement

Child Protection and Safeguarding Policy Ratified:

Child Protection and Safeguarding Policy Review: Autumn 2019

Child Protection and Safeguarding Policy Review: Autumn 2020

Child Protection and Safeguarding Policy Review: Autumn 2021

**These appendices are based on the Department for Education’s Statutory Guidance, Keeping Children Safe in Education 2021.**

## **Appendix 1: Types of Abuse**

**Abuse** is a form of maltreatment of a child, somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. However abuse including neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap.

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children

**Neglect** is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger



- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- Neglect of, or unresponsiveness to, a child's basic emotional needs.

## Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures

### Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2021. It is vital that the Governing Body and the Senior Leadership Team adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in school.

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

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

### Advertising

When advertising roles, we will make clear:

- The skills, abilities, experience, attitude and behaviours required for the post
- The safeguarding requirements, e.g. to what extent the role will involve contact with children and will they be engaging in regulated activity relevant to children
- The school's commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the post, as per the job description and personal specification
- Whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. Which means that when applying for certain jobs and activities certain spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. Further information about filtering offences can be found in the [DBS filtering guide](#).

### Application forms

Our application forms will:

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

Applicants should provide the following:

- Personal details, current and former names, current address and national insurance number
- Details of their present (or last) employment and reason for leaving
- Full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
- Qualifications, the awarding body and date of award
- Details of referees/ references
- A statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

## **Shortlisting**

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

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted
  - If they are known to the police and children's social care
  - Have they been disqualified from providing child care
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true.

## **Seeking references and checking employment history**

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

When seeking references we will:

- Not accept open references e.g. to whom it may concern
- Not rely on applicants to obtain their references.
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Headteacher/Principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children (if not currently working with children). If the applicant has never worked with children, then ensure a reference from their current employer
- Always verify any information with the person who provided the reference
- Ensure electronic references originate from a legitimate source
- Compare the information on the application form with that in the reference and take up any discrepancies with the candidate
- Resolve any concerns before any appointment is confirmed.

## **Interview and selection**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

- Explore any potential areas of concern to determine the candidate's suitability to work with children e.g. indicators of negative safeguarding behaviours etc
- Record all information considered and decisions made.

## Pre-appointment vetting checks

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

### New Staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks.

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS check (including barred list information for those who will be engaging in regulated activity with children). When using the DBS update service, the school still need to obtain the original physical certificate
- Obtain a separate barred list check if they will start work in regulated activity before the DBS Certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then school should follow the advice on the [GOV.UK](https://www.gov.uk) website
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order issued by the Secretary of State if they are employed to be a teacher
- Further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, where available, these will include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- We will ask for written information about previous employment history and check that information is not contradictory or incomplete
- We will seek references on all short-listed candidates, including internal candidates, before interview where possible. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children
- We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not. Personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing for reasons of age, illness or disability.

## Existing Staff

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

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

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

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

## Agency and Third-Party Staff

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

## Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors
- We will not keep copies of such checks for longer than 6 months
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances
- We will check the identity of all contractors and their staff on arrival at the school
- For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

## Trainee/Student Teachers

- Where applicants for Initial Teacher Training are salaried by us, we will ensure that all necessary checks are carried out.
- Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.
- In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **Volunteers**

We will:

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

## **Governors**

- All Governors will have an enhanced DBS check without barred list information
- They will have an enhanced DBS check with barred list information if working in regulated activity
- All Governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

## **Staff working in Alternative Provision Settings**

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

## **Adults who Supervise Pupils on Work Experience**

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

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

## Appendix 3: Allegations of Abuse Made Against Staff

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

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education 2021.

This section of this policy applies to all cases in which it is alleged that a current member of staff (including supply staff, volunteers and contractors) has:

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

It applies regardless of whether the alleged abuse took place in the school. We will deal with any allegation of abuse against a member of staff, volunteer or contractor very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'Case Manager' will lead any investigation. This will be the Headteacher, or the Chair of Governors where the Headteacher is the subject of the allegation. The Case Manager will be identified at the earliest opportunity.

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

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

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.

If in doubt, the Case Manager will seek views from the School's Personnel Adviser and the Designated Officer at the Local Authority, as well as the Police and Children's Social Care where they have been involved.

### Definitions for Outcomes of Allegation Investigations

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

## Procedure for Dealing with Allegations

In the event of an allegation that meets the criteria above, the Headteacher (or Chair of Governors where the Headteacher is the subject of the allegation) – the ‘Case Manager’ – will take the following steps:

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



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

If the school is made aware that the Secretary of State has made an Interim Prohibition Order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

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

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

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Governing Board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

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

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

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

### **Specific Actions**

#### **Action Following a Criminal Investigation or Prosecution**

The Case Manager will discuss with the Local Authority's Designated Officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the Police and/or Children's Social Care Services.

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

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

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

### **Individuals Returning to Work after Suspension**

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

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

### **Unsubstantiated or Malicious Allegations**

#### **If a report is:**

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

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

#### **If an allegation is:**

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

### **Confidentiality and information sharing**

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

The Case Manager will take advice from the Local Authority's Designated Officer, Police and Children's Social Care Services, as appropriate, to agree:

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

### **Record-keeping**

The Case Manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file). For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved

- Notes of any action taken and decisions reached (and justification for these, as stated above)
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with Children’s Social Care or the Police as appropriate.

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

## References

When providing employer references, we will:

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

## Learning Lessons

After any cases where the allegations are *substantiated*, the Case Manager will review the circumstances of the case with The Local Authority’s Designated Officer to determine whether there are any improvements that we can make to the school’s procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

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

## Non-recent allegations

Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with our Local Authority’s procedures for dealing with non-recent allegations. Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

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

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

## Definition of low-level concerns

The term ‘low-level’ concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language.

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

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 8.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system.

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

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

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

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy/code of conduct.

### **Record keeping**

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the Designated Officer at the Local Authority
- Retained at least until the individual leaves employment at the school

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

## References

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

- The concern (or group of concerns) has met the threshold for referral to the Designated Officer at the Local Authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

## Appendix 4: Specific Safeguarding Issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular Annex B. Annex B also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime.

### Children Missing from Education

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Where a parent notifies a school that a pupil will live at another address, we will record in the admission register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when it is expected the pupil will live at this address.

Where a parent of a pupil notifies the school that the pupil is registered at another school or will be attending a different school in future, schools must record in the admission register:

- The name of the new school
- The date when the pupil first attended or is due to start attending that school.

We will inform the Local Authority if a child leaves the school without a new school being named, adhering to requirements with respect to sharing information with the Local Authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow Local Child Protection Procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the Local Authority Children's Social Care Team, and the Police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child Criminal Exploitation (CCE)**

Child Sexual Exploitation (CSE) is a form of child abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation is a form of modern slavery that sees victims being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, forced to shoplift or pickpocket, or to threaten other young people).

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's Children's Social Care Team and the Police, if appropriate.

### **Child Sexual Exploitation (CSE)**

Child Sexual Exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. The victim may have been sexually exploited even if the sexual activity appears consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. CSE does not always involve physical contact; it can also occur through the use of technology.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- Children who have older boyfriends or girlfriends; and
- Children who suffer from sexually transmitted infections or become pregnant.

If a member of staff suspects CSE or CCE, they will discuss this with the DSL. The DSL will trigger the Local Safeguarding Procedures including a referral to the Local Authority's Children's Social Care Team, and the Police, if appropriate.

### **County Lines**

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. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and

weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

- 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 active 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.

### **Domestic Abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, the children may blame themselves for the abuse or may have had to leave the family home as a result. If Police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the Designated Safeguarding Lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#). The DSL will provide support according to the child's needs and update records about their circumstances.

### **Operation Encompass**

Operation Encompass operates in the majority of Police Forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when Police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the Police will inform the key adult (usually the Designated Safeguarding Lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can provide support to the child according to their needs. Police Forces not signed up to operation encompass will have their own arrangements in place.

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.



Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safe Lives: young people and domestic abuse.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and the Deputy DSL will contact the Local Housing Authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to Children's Social Care.

#### **Barnet Housing Authority Contact details**

Barnet House, 1255 High Road,

Whetstone, London N20 0EJ

Telephone: 020 8080 6587

Email: [housingadvice@barnethomes.org](mailto:housingadvice@barnethomes.org)

### **So-called 'Honour-Based' Abuse (including FGM and Forced Marriage)**

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

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

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

### **FGM**

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

**Section 8.3** of this Policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues.

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behavior
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs.

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out

- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

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

### **Forced Marriage**

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the Local Safeguarding Procedures and refer the case to the Local Authority's Designated Officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)
- Refer the pupil to an Education Welfare Officer, Pastoral Tutor, Learning Mentor, or School Counsellor, as appropriate.

### **Preventing Radicalisation**

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**Extremism** is vocal or active opposition to Fundamental British values, such as Democracy, the Rule of Law, Individual Liberty, and Mutual Respect and Tolerance of Different Faiths and Beliefs. This also includes calling for the death of members of the armed forces.

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from being drawn into terrorism.

- The DSL and school staff will undertake Prevent Awareness Training and make sure that staff have access to appropriate training to equip them to identify children at risk

- We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our Local Safeguarding Partners and Local Police Force
- We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home
- There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period
- Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out in [section 8.4](#) of this Policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

**Channel** is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

[Further information on the school's measures to prevent radicalisation are set out in the School's Prevent Policy.](#)

### **Peer-on-Peer Abuse**

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online. Peer-on-peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content. If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in [section 8](#) of this policy, as appropriate.

### **Serious Violence**

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to, the following:

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

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violent crime. Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery
- A history of committing offences
- Substance abuse
- Anti-social behaviour
- Truancy
- Peers involved in crime and/or anti-social behavior.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

### **Sexual Violence and Sexual Harassment between Children in Schools**

Sexual violence and sexual harassment can occur:

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

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

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

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

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

Staff should be aware of the importance of:

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

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

### **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.

### **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.

### **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' from HM Courts and Tribunals Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead and the Deputy should consider the context of incidents and whether children are at risk of abuse or exploitation in situations outside their families– this is known as contextual safeguarding. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

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 Children's Social Care Services

### **Mental Health**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the Designated Safeguarding Lead or Deputy.

### **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.

### **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.

### **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.

### **Checking the Identity and Suitability of Visitors**

- All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit
- If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting
- Visitors should be ready to produce identification
- Visitors are expected to sign the Visitors' Book and wear a Visitor's Badge.

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

- Will be asked to show their DBS certificate (if they are not employed by the LA), which will be checked alongside their photo ID; or
- Details of a professional visiting the School on a regular basis, sent by an organisation such as the LA or Educational Psychology Service, will be added to the School's Single Central Record.

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

### **Non-Collection of Children**

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

- Check for any information about changes to the normal collection routines. If no information is available, parents/carers will be contacted at home or at work
- If this is unsuccessful, we will contact the 'Emergency Contact'. All reasonable attempts will be made to contact the parents or nominated carers. The pupil will not leave the premises with anyone other than those named as an emergency contact or specified to collect on the day

- If no-one collects the child after one hour and there is no-one who can be contacted to collect the child, we will apply the procedures for uncollected children. We will contact our Local Authority Social Services Department or the Out of Hours Duty Officer or the Police
- The pupil will stay at setting in the care of two fully-vetted workers until the pupil is safely collected either by the parents or by a social worker
- Social Services will aim to find the parent or relative if they are unable to do so, the child will be admitted into the care of the Local Authority
- Under no circumstances will staff go to look for the parent, nor do they take the child home with them.
- A full written report of the incident is recorded
- Ofsted may be informed.

### **Missing Pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If at any time during the school day a child is noticed as missing the following procedure will take place:

- As soon as it is noticed that a child is missing, staff will alert a senior member of staff
- The senior staff and any other available staff will carry out a thorough search of the school buildings, playground and other outdoor areas
- The registers will be checked to make sure no other child is missing
- External doors and gates are checked to establish whether there has been a breach of security
- If the child is not found, the parent/guardian is contacted and the missing child is reported to the Police (101)
- When the police arrive they will co-ordinate the search and staff will comply fully with their instructions; staff should continue to search unless instructed by Police to stop.

### **Follow-up to the Incident:**

- When the child is found their needs and those of the parent are paramount. Emotions are likely to be running high, and this should be considered when trying to establish what happened immediately before the child left the school premises
- It should be established whether the child is injured or has been harmed in any way, and the appropriate action taken
- After the search there will be a need to meet with staff to reassure them and to take the opportunity to debrief
- An incident report should be completed by the staff member co-ordinating the search and handed to the DSL. This will be placed in the School's Safeguarding File
- The Headteacher will inform the Chair of Governors and any other relevant body as appropriate
- A Risk Assessment Review will take place in the area from which the child went missing as soon as possible, and no longer than 3 days after the event. Any identified security improvements should be put in place as soon as possible
- A meeting should be held with both the parent and the child to establish how the incident occurred, and what actions or support will be necessary to prevent such an incident from happening again in the future.

### **This may include:**

- Pupil support with the involvement of the Inclusion Leader/SENCo, other staff member or identified professional
- An Individual Risk Assessment being reviewed or put in place
- A Behaviour or Learning Support Plan being reviewed or put in place
- A 'check-in' or buddy system being established
- Potential referral to an external agency where the pupil's safety, mental or emotional health and well-being are felt to be at risk.
- A sanction being applied in line with the School's Behavior Management Policy, if appropriate
- The incident should be discussed at the next staff meeting and any recommendations for improvements in the procedure should be made to the Governing Body.



### **Missing Child (Off-Site School Visits)**

If a child goes missing from an educational visit where parents are not attending and responsible for their own child, the following procedure applies:

- As soon as it is noticed that a child is missing, staff on the visit ask children to stand with their designated person and carry out a headcount to ensure that no other child has gone astray
- One staff member will search the immediate vicinity but does not search beyond that
- The staff contact the Police using a mobile phone and report the child as missing
- The person in charge informs the Headteacher who will then liaise with the Police, inform the Local Authority and contact the family
- If appropriate, the Headteacher may make their way to the venue to aid the search and be the point of contact for the Police as well as support staff
- In an indoor venue, the staff contact the venue's security staff who will handle the search and contact the Police if the child is not found.

### **Investigation Following the Safe Recovery of the Child**

- The Headteacher, with the support of the police is appropriate, carries out a full investigation taking written statements from all the staff present at the time.
- An Incident Log Sheet should be completed detailing:
  - The date and time of the report
  - Staff/children were in the group
  - When the child was last seen in the group
  - What has taken place in the group since then
  - The time it is estimated that the child went missing
  - Any other relevant details, including the recovery of the child
  - A conclusion is drawn as to how the breach of security happened.

### **Missing Child from Parental Care**

At busy times of the day and during family events school children occasionally go missing from the care of their parents. In order to try to ensure that the child is found quickly and safely the above procedures will still apply.

### **Arrangements at the End of After School Clubs**

Every After School Club will have a register of children attending.

Unless permissions have been obtained in writing to the contrary, all pupils will be signed over to their parents at the end of the club by a member of staff. SLT members (on duty) can be contacted via school mobile phones immediately to report any incidents / concerns raised by the staff for immediate action.