

# Safeguarding and Child Protection Policy and Procedures



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## Contents

|   |
|---|
| Overarching Principles  |
| Aims, Legislation and Statutory Guidance  |
| Definitions   |
| Equality Statement  |
| Roles and Responsibilities (DSL, CPL, Staff, Trustee & LEC Members)                               |
| Confidentiality   |
| Recognising Abuse and Taking Action   |
| Notifying Parents   |
| Mobile Phones and Cameras   |
| Complaints and Concerns About School Safeguarding Practices                                       |
| Record-Keeping  |
| Training  |
| Recruitment   |
| Use of School or College Premises for Non- School Activities                                      |
| Elective Home Education   |
| Monitoring Arrangements   |
| Links With Other Policies   |
| Appendix 1: Types of Abuse  |
| Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures                              |
| Appendix 3: Concerns, complaints or allegations about a staff member, supply teacher or volunteer |
| Appendix 4a: Specific Safeguarding Issues   |
| Appendix 4b: Response to Reports of Sexual Harassment/Violence by Pupils                          |
| Appendix 5: Teddy Acronym   |
| Appendix 6: DSL School Poster   |
| Appendix 7: Raising a Concern   |
| Appendix 8: Training Requirements   |
| Appendix 9: Covid-19 School Closure Arrangements for Safeguarding and Child Protection            |
| Appendix 10: Managing Low Level Concerns Flow Chart   |

## Overarching Principles

- At the ELT Partnership we consider there is no higher priority than ensuring the safety and well-being of all our pupils, all of the time. We also take very seriously our duty to ensure the safe and effective care of all adults, including volunteers, who work within our family of schools.
- This means that our safeguarding responsibilities do not begin and end at the school gates, nor do they finish with the end of school bell. We are all responsible for creating a culture where our pupils feel safe in an environment where they can thrive in every aspect of their development and education.
- However, we live in a world which poses great risk to pupils. In fact, the challenges of keeping our youngest and most vulnerable people safe are becoming ever more complex. We must therefore work with parents and carers and the many professional organisations which exist to provide support and expert guidance. Equally, we must educate our children in ways which are appropriate to their age and understanding about how they can take sensible precautions to keep out of harm's way. This is why we hold assemblies addressing such issues as peer on peer abuse and knife crime and why we go to great lengths to ensure our curriculum keeps pace with the changing threats in society.
- We acknowledge that safeguarding incidents do occasionally happen in school and that sometimes things can go wrong. This drives our ethos of continuous improvement; if an incident happens we will act swiftly, take incisive action and learn any lessons to improve our practice and protocols.
- In ELT schools the Headteachers are the Designated Safeguarding Leads with overall responsibility for safeguarding and child protection. They are supported by a team of trained staff which includes the Child Protection Lead who has primary responsibility for child protection issues, and leads the Child Protection Officers. Their roles are set out in section 5 and each school's individual policy will identify the names of all designated staff. All staff that are part of the team will have current designated child protection training.
- Additionally, ELT has a Trustee Committee for safeguarding, health and safety and wellbeing which meets each term to review safeguarding practise and report any recommendations to the full Trust Board.
- This Safeguarding and Child Protection Policy and Procedures sets out the legislation we must follow in schools and explains how we deal with any concerns or incidents that arise. It describes different forms of abuse and how our staff are trained to identify factors which may indicate a child is suffering harm. We review this policy thoroughly each year to make sure it reflects the most current thinking around best practice and that it supports our overriding ELT ethos that every child must 'be included'.
- To see an individual school's Safeguarding and Child Protection Policy and Procedures visit the school website.

## 1. Aims of the policy

It is a fundamental principle within this policy that all teaching and non-teaching staff are vigilant in their approach to safeguarding and understand the need to safeguard children at all times and are clear about their responsibilities in identifying and reporting possible cases of abuse in a timely manner.

Furthermore, the policy aims to:

- Develop structured procedures which encourages good communication between all members of the school community
- Provide a systematic means of monitoring children known or thought to be at risk of harm.
- Encourage all pupils to develop a sense of autonomy, independence, security, self-confidence and the vocabulary to be able to resist inappropriate approaches.
- Help pupils establish and sustain positive relationships within their families, with peers, and other adults.
- Work in partnership with parents/carers to build their understanding of, and commitment to, the principles of safeguarding all our pupils.
- Develop and promote collaborative working relationships with other agencies, especially the Police and Social Care.
- Ensure all adults within our schools, who have access to pupils, have been checked as to their suitability.

## 2. Legislation and statutory guidance

This policy sets out guidance and procedures that our schools will take to ensure appropriate action is taken in a timely manner to safeguard and promote the welfare of our pupils. Its contents are intended to be in accordance with all relevant Government guidelines and legislation, as well as the inter-agency procedures provided by the Local Safeguarding Partnership.

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children 2018](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our Local Safeguarding Partnership.

This policy is also based on the following guidance and legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989 \(and 2004 amendment\)](#), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and Childcare Act 2006, which set out who is disqualified from working with children
- DfE Children Missing From Education, which provides school guidance for pupils who are missing from education and the parents' and schools' responsibilities
- ELT Staff Code of Conduct, which sets the standards and expectations for staff and volunteers
- ELT Behaviour policy
- UK Council for Child Internet Safety, which is a group of organisations from across government, law, industry, academia and charity sectors that work in partnership to help keep children safe
- Safer Recruitment Consortium guidance for safer working practice for those working with pupils in education settings

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

This policy also complies with our funding agreement and articles of association.

#### **Liaison with other Bodies**

- We work within the Local Safeguarding Partnership guidelines.
- We have a copy of 'What to Do if You Are Worried a Child is Being Abused' for parents/carers and staff, and all staff are familiar with what to do if they have concerns.
- We have procedures for contacting the Local Authority on safeguarding issues, including maintaining a list of names, addresses and telephone numbers of social workers to ensure that it is easy, in any emergency, for the school and Social Care to work well together.
- Details of the local NSPCC contacts are also kept.
- If a referral is to be made to the LA Children's Social Care department, we act within the Local Safeguarding Partnership guidance in deciding whether we must inform the child's parents/carers at the same time.
- Social Services and the Local Safeguarding Partnership is based at:
  - Charles Babbage House, 1 Orton Grove, Enfield EN1 4TU
  - Children's MASH (Multi Agency Safeguarding Hub) 020 379 5555
  - Out of hours - contact the Duty Officer: 020 8379 1000, in an emergency call 999
  - Local Safeguarding Partnership 020 8379 2767
  - Prevent 020 8379 6137
  - The NSPCC has a 24-hr help line: 0808 800 500

### **3. Definitions**

**Safeguarding and promoting the welfare of pupils** means:

- Protecting pupils from maltreatment
- Preventing impairment of children's and young people's mental and physical health or development

- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all pupils to have the best outcomes

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

- **Abuse** is a form of maltreatment of a pupil which 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.
- **A child includes** everyone under the age of 18.

**Safeguarding action may be needed to protect pupils from:**

- neglect
- physical, sexual or emotional abuse
- bullying, including online bullying and prejudice-based bullying
- racist, disability, homophobic or transphobic abuse
- gender-based violence, or violence against women and girls
- radicalisation or extremist behaviour
- child sexual exploitation and trafficking
- the impact of new technologies on sexual behaviour, for example 'sexting' and accessing pornography
- teenage relationship abuse
- substance misuse
- issues that may be specific to a local area or population, for example gang activity and youth violence
- domestic violence
- female genital mutilation
- forced marriage
- fabricated or induced illness
- poor parenting, particularly in relation to babies and young children
- any other issues that pose a risk to children, young people and vulnerable adults

**Safeguarding also relates to broader aspects of care and education, including:**

- pupil health, safety and well-being, including their mental health
- meeting the needs of pupils who have special educational needs or disabilities
- the use of reasonable force
- meeting the needs of pupils with medical conditions
- providing first aid
- educational visits
- intimate care and emotional well-being
- online safety and associated issues
- appropriate arrangements to ensure pupils' security, taking into account the local context

#### 4. Equality statement

Some pupils are at greater risk of abuse and are less likely to recognise and/or disclose concerns because of prevailing barriers such as mental health vulnerability. We are committed to anti-discriminatory practice and recognise pupils' diverse circumstances. We ensure that all pupils have the same protection, regardless of any barriers they may face. We give special consideration to a pupil who:

- has special educational needs or disabilities (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- has returned home to their family from care;
- is a privately fostered pupil.
- is known to be living in difficult family circumstances – for example, temporary accommodation or where there are issues such as substance abuse, adult mental health problems or domestic violence;
- is showing early signs of abuse and/or neglect;
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- has English as an additional language
- is at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- is at risk of modern slavery, trafficking or exploitation;
- is an asylum seeker
- Are looked after or previously looked after (see section 8)

#### 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, Trustees and members of the Local Education Committees/ Interim Management Boards in our schools and is consistent with the procedures of the Local Safeguarding Partnership. Our policy and procedures also apply to extended school and off-site activities.

##### 5.1 All Staff

All staff and volunteers have a responsibility to raise concerns about any suspicion of abuse, including those involving the attitudes or actions of colleagues.

All staff will read and understand part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the staff behaviour policy and the role of the designated safeguarding lead (DSL) and child protection lead (CPL)

- The early help process and their role in it, including identifying emerging problems, liaising with the CPL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation

Section 12 and **Appendix 4** of this policy outline in more detail how staff are supported to do this.

## **5.2 The Designated Safeguarding Lead (DSL) and Child Protection Lead (CPL) (Appendix 6)**

Each school has a **Designated Safeguarding Team**, who *each* receive full Designated Safeguarding Lead training.

The team is led by the **Designated Safeguarding Lead (DSL)**, the Headteacher, with overall responsibility for *all aspects* of safeguarding and child protection. The Deputy Headteacher/s is the **Deputy Safeguarding Lead**.

The safeguarding team also includes a **Child Protection Lead (CPL)** who has primary responsibility for child protection matters. The CPL may be supported by a **Child Protection Officer (CPO)**

The **CPL** at each school deals with child protection issues in the first instance. In their absence, the **CPO** or **any other member of the Safeguarding team** may act and report back to the **CPL**.

A member of the safeguarding team has particular responsibility to promote the educational achievement of Looked After Pupils.

Each school's Safeguarding and Child Protection Policy and Procedures will identify the names of the DSL, DDSL, CPL and CPOs and how they can be contacted.

### **Role of Headteacher/ Designated Safeguarding Lead (DSL). In the absence of the Headteacher the Deputy Headteacher is the Deputy Designated Safeguarding Lead (DDSL)**

The Headteacher at each school is responsible for the implementation of this policy, including:

- Ensuring that all staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the CPL has appropriate time, funding, training and resources, and that there is always adequate cover if the CPL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, including online safety training and update this regularly, including designated safeguarding training for the designated safeguarding team
- 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



- Lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college

**DSL, CPL and CPOs are responsible for:**

- Adhering to school procedures with regard to referring a pupil if there are concerns about possible abuse
- Keeping written records of concerns about a pupil even if there is no need to make an immediate referral
- Ensuring that all such records are kept confidentially and securely and are separate from pupil records
- Ensuring that all safeguarding records are forwarded under confidential cover to a pupil's new school in the event of them leaving
- Ensuring that any pupil currently subject to a Child Protection Plan who is absent without explanation is referred to Social Services on the first day of absence
- Ensuring that all school staff have received safeguarding training, which is regularly reviewed and updated, and are informed of changes in legislation or good practice
- Supporting in developing knowledge and skills to encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them and to understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

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

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

The CPL will also keep the DSL informed of any issues and liaise with Local Authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the CPL are set out in their job description.

**5.3 Safeguarding Link Member on Local Education Committees (LEC)/ Interim Management Board (IMB)**

Each school will have a Safeguarding Link on its LEC/ IMB who will:

- Monitor how the school is providing a safe environment for pupils by monitoring compliance with this safeguarding policy
- Speaking to children to hear 'pupil voice' about safeguarding e.g. how safe they feel in school
- Check school-based Single Central Record (SCR) for staff, contractors and volunteers
- Undertake necessary safeguarding training

#### **5.4 Trust Board - Safeguarding, Health and Safety and Wellbeing Committee**

The committee will:

- Ensure consistency across ELT of compliance and implementation of policy
- Receive reports from LEC Safeguarding Links and report back to Trust Board on key issues
- Check Single Central Record held centrally at ELT
- Review this safeguarding policy on annual basis with the safeguarding steering group
- Work with the Headteacher and Executive team in carrying out annual audits in each school

#### **5.5 Trust Board**

The Board of Trustees will:

- Be accountable for safeguarding across the Trust
- Approve safeguarding policy (at least annually)
- Appoint a Safeguarding, Health and Safety and Well-Being Committee to monitor the effectiveness of this policy in conjunction with safeguarding link members from the Local Education Committees/ Interim Management Boards across each school.

### **6. Confidentiality**

- Confidentiality is a key principle which needs to be fully understood by all those working with pupils, particularly in the context of child protection.
- All matters relating to child protection are strictly confidential. We respect the right of families to have information about them dealt with sensitively and confidentially in line with statute and guidance. Child protection information referring to pupils in our schools will only be shared with staff on a strictly 'need to know' basis e.g. when sharing the information is demonstrably in the pupil's best interests.
- It is essential that staff are aware that they must share information in a timely manner and will report any concerns at the earliest opportunity with the appropriate person e.g. the CPL and/ or DSL and with other agencies as appropriate.
- Staff need to know that they must not guarantee confidentiality to a parent or carer and must make it clear that information will be shared if there are concerns about the welfare of a pupil, even if they do not consent to the sharing of information.
- Similarly, staff should never promise a pupil that they will not tell anyone else about an allegation, as this may not be in the pupil's best interests. They must always make it clear to pupils in language that is appropriate to their age and understanding that any information may need to be shared so that measures can be taken to safeguard a pupil who may be at risk.
- Confidentiality is also addressed in this policy with respect to record-keeping in section 11, and allegations of abuse against staff in appendix 3.7. *Recognising abuse and taking action*

Staff, volunteers, trustees and members of the Local Education Committees must follow the procedures set out below in the event of a safeguarding issue.

## 7. Recognising Abuse and Taking Action

### 7.1 If a pupil is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a pupil is in immediate danger or at risk of harm. **Anyone can make a referral.**

Tell the CPL (see section 5.2) as soon as possible if you make a referral directly. The CPL will inform the DSL as soon as practicable.

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

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the pupil 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 pupil's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the CPL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the CPL as soon as possible that you have done so.

### 7.3 If you discover that FGM has taken place or a pupil is at risk of FGM (see Appendix 4)

- The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.
- **Any teacher** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a 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
- The duty 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 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 CPL and follow our local safeguarding procedures.
- **Any member of staff** who suspects a pupil is *at risk* of FGM, must speak to the CPL and follow our local safeguarding procedures.

#### **7.4 If you have concerns about a pupil (not a pupil being in immediate danger)**

- Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.
- Where possible, speak to the CPL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).
- You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.
- Share details of any actions you take with the CPL as soon as practically possible.

#### **Early help**

- If early help is appropriate, the CPL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.
- The CPL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

#### **Referral**

- If it is appropriate to refer the case to local authority children's social care or the police, the CPL will make the referral or support you to do so.
- If you make a referral directly (see section 7.1), you must tell the CPL 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 CPL 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 pupil's situation does not seem to be improving after the referral, the CPL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the pupil's situation improves.

#### **7.5 If you have concerns about extremism (Appendix 4)**

If a pupil is not at immediate risk of harm, where possible, speak to the CPL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above). Inform the CPL or deputy as soon as practically possible after the referral.

Where there is a concern, the CPL 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, that school staff can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

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

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

## **7.6 Concerns about a staff member or volunteer (Appendix 3)**

- If there are concerns about a member of staff or volunteer, this must be reported to the Headteacher as DSL.
- If there are concerns about the Headteacher, a member of the ELT Executive team or ELT central team, this must be reported this to the Chief Executive Officer of the ELT Partnership
- You can also discuss any concerns about any staff member or volunteer with the DSL.
- The DSL or Chief Executive Officer will then follow the procedures set out in appendix 3, as appropriate.

## **7.7 Allegations of abuse made against other pupils/ Peer-on-Peer Abuse (Appendices 4a & 4b)**

We recognise that pupils are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter” or “part of growing up”.

Most cases of pupils hurting other pupils will be dealt with under the school’s behaviour policy, but the Safeguarding and Child Protection Policy and Procedures 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 or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

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

- You must tell the CPL and record the allegation, but do not investigate it
- All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- Where there is a safeguarding concern, Trust Boards, proprietors and school leaders should ensure the child’s wishes and feelings are taken into account when determining what action to take and what services to provide.
- The CPL 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 CPL will put a risk assessment and support plan into place for all pupils involved – both the victim(s) and the pupil/s against whom the allegation has been made – with a named person they can talk to if needed
- The CPL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour. It is recognised that abusive behaviours which may indicate that the perpetrator may present as an on-going risk to other pupils
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils

- Ensuring our whole school curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially through a well promoted system that can be easily understood and easily accessible for pupils to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the pupils is being abused themselves, and that this would fall under the scope of this policy

## 8. Looked-after and previously looked-after children

*(Please also refer to the ELT Designated Teacher for Looked After and Previously Looked After Children Policy.)*

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

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

We have appointed a designated teacher, Amy Fry (Deputy Headteacher), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

## 9. If you have a mental health concern

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

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

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

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

Staff with concerns about a pupil's wellbeing should discuss this matter with the school's SENDCo, Alexandra Voelcker, who will discuss the concern with the child's parent/carer. With permission from the parent/carer, support may be provided through the school's own pastoral interventions which would be closely monitored and referred to outside agencies if necessary.

## 10. 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

## 11. Notifying parents

- Where appropriate, we will discuss any concerns about a pupil with the pupil's parents. The CPL will normally do this in the event of a suspicion that the pupils is at risk or following a disclosure.
- Other staff will only talk to parents about such concerns following consultation with the CPL.
- If we believe that notifying the parents would increase the risk to the pupil, 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 pupils, we will normally notify the parents of all the children involved.

## 12. Mobile phones and cameras

- Parents are permitted, at the school's discretion, to take photographs/videos of their child in school events such as assemblies, etc. (parents have the right to withdraw their children from such events). However, these photographs/videos must not be shared or communicated on social media sites by the parent. Parents must not disrupt the event in anyway when taking photos or videoing. Any breach of this policy will be taken seriously and investigated.
- 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 members' personal phones will remain in their bags or cupboards during contact time with pupils.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Our schools will comply with the General Data Protection Regulation 2018 when taking and storing photos and recordings for use in the school.
- The school has a clear policy on the use of pupils using their personal mobile and/or smart technology whilst in school. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

### **13. Concerns and complaints about a staff member, supply teacher or volunteer**

13.1 If you have concerns about a member of staff (including a supply teacher, volunteer or any adult in school), or an allegation is made about a member of staff, posing a risk of harm to children, speak to the Headteacher.

Staff are reminded of the need to report any concern immediately and without delay even if they feel it is low-level. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’, that an adult working in or on behalf of the school 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 LADO.

If the concerns/allegations are about the Headteacher, speak to the Chair Executive Officer. The Headteacher/Chief Executive Officer will then follow the procedures set out in appendix 3, if appropriate.

### **13.2 Other complaints**

Complaints which may involve more general safeguarding concerns will be dealt with in accordance with the ELT Complaints Policy and Procedures which is available on the website.

### **13.3 Whistleblowing (see Enfield/ ELT Whistleblowing Policy)**

- Whistleblowing inside the work place is the term used to describe reporting by employees or ex-employees, of wrongdoing on the part of management, the Board of Trustees or by fellow employees.
- Wrongdoing may include for example, fraud, corruption, malpractice, breach of health and safety law, any other illegal or unethical act or breaches of the Trust Code of Conduct. Employees may, for this purpose include, for example, contractors and agency workers.

### **Protecting the Whistleblower**

- Under the Public Interest Disclosure Act 1998 a whistle-blower is protected from detriment and unfair dismissal. The Trust will support and not discriminate against concerned employees who apply the whistle-blowing procedure, provided any claim is made in good faith.

### **When Should Whistleblowing Procedures Be Used?**

- If an employee has concerns about a matter which has implications for safeguarding and/or child protection but feels unable to report the matter in the normal way (through DSL and/or CPL as at 7.1) then they may use the whistle blowing process to report the matter. See ELT Whistle Blowing Policy for guidance on process.

## **14. Record-keeping**

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 CPL.



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 for a reasonable period of time after they have left the school:

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## **15. Training (Appendix 7)**

### **15.1 All staff**

- All staff members will undertake safeguarding and child protection training at induction, including 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 regularly updated and will be in line with advice from our Local Safeguarding Partnership. Training includes online safety training that is integrated, aligned and considered as part of the whole school safeguarding approach. This is part of the wider staff training and curriculum planning.
- 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.

### **15.2 The Child Protection Lead and Child Protection Officers**

- The CPL and CPOs will undertake designated 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/CPLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training.

### **15.3 Trustees/ Link Safeguarding Roles**

All Trustees and members of LECs with link Safeguarding roles receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

### **15.4 Recruitment – interview/appointment panels**

At least one person on any interview/appointment panel 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 be in line with local safeguarding procedures.

## 16. Use of school premises for non-school activities

It has not always been clear who is responsible for safeguarding when a school is let out to third-party users. Keeping Children Safe in Education (2021) now says that when 'services or activities are provided by the Trust Board, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply.

However, where services or activities are provided by another body, the Trust Board should seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. The safeguarding arrangements will be included in any lease or hire agreement as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

## 17. Elective Home Education

The DfE recognise that many home educated children have an overwhelmingly positive learning experience. However, it can also mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, it is recommended that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

## 18. Monitoring arrangements

This policy will be reviewed **annually** by the Trustee Safeguarding, Health and Safety and Wellbeing Committee. After the policy has been reviewed it will be referred to the Trust Board for approval.

## **19. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour
- Staff Code of Conduct
- Complaints Policy and Procedures
- Attendance
- Health and Safety
- Relationship and Sex Education
- First Aid and Managing Medicines
- Curriculum
- Whistle blowing
- Equality
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Online Safety

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

## Appendix 1: Types of abuse

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 (including via the internet)

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

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

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

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

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

In addition to the above, we recognise that there are a number of specific safeguarding issues that require special consideration due to their complex nature.

**Appendix 4 sets out details of specific safeguarding issues**

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

We will record all information on the checks carried out in the school's single central record (SCR) which is held centrally at ELT. 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. Additionally, each school will keep their own SCR to keep records of local contractors working on site.

### **Appointing new staff**

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- 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. We will scrutinise these and resolve any concerns before confirming appointments.

**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
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

### **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 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.

### **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 Childcare Disqualification (Regulations) 2009 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
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 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

### **Governance**

All Trustees and members of the Local Education Committees will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

The Chair of the Board of Trustees will have their DBS check countersigned by the secretary of state.

All Trustees, proprietors will have the following checks:

- Section 128 direction [only required for local governors if they have been delegated any management responsibilities]
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### Appendix 3: Concerns, complaints or allegations about a staff member, supply teacher or volunteer

This section of the policy is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education and applies to all cases in which it is alleged that a staff member, supply teacher or volunteer has:

- Behaved in a way that has harmed a pupil, or may have harmed a pupil, or
- Possibly committed a criminal offence against or related to a pupil, or
- Behaved towards a pupil in a way that indicates he or she would pose a risk of harm to pupils
- 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. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police. We will deal with any allegation of abuse against a member of staff, supply teacher or volunteer 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 CEO** 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 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
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work within ELT.

#### 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
- **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)

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of LGB 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
- Immediately discuss the allegation with the Local Authority Designated Officer. 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 LADO – 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 LADO 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 LADO (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 LADO, police and/or children’s social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 school day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO 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 LADO to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. All contracted employees have access to an Employee Assistance Programme provided by Health Assured available via their Perkbox app. A suite of services are available including 24/7 confidential helpline, up to 4 free structured counselling sessions, critical incident and trauma support and online health portal for wellbeing information and financial assessment tools. Other available options include:
  - Occupational Health
  - Individual risk assessment or stress action plan
  - Trade union advice or school representative
  - The Education Support Partnership: <https://www.educationsupport.org.uk/> (Free, confidential support for education staff no matter the problem)
  - Mind: <https://www.mind.org.uk/information-support/coronavirus-and-your-wellbeing/> (Guidance on coronavirus and wellbeing)



- Mental Health Foundation: <https://www.mentalhealth.org.uk/publications/looking-after-your-mental-health-during-coronavirus%20outbreak>
  - NHS: <https://www.nhs.uk/oneyou/every-mind-matters/coronavirus-covid-19-staying-at-home-tips/>
  - Samaritans: <https://www.samaritans.org/> (The Samaritans provide information and advice for anyone who is worried about their mental health especially during the coronavirus pandemic)
  - We are Undefeatable (<https://weareundefeatable.co.uk/covid-19>)
- Inform the parents or carers of the pupil/s 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 pupil/s involved informed of the progress of the case and the outcome, and where there is not a criminal prosecution, whether there has been any disciplinary process undertaken (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 pupil, or if the individual otherwise poses a risk of harm to a pupil

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 or Trust 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 or trust 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 trust’s disciplinary process, should this be required at a later point.

### **Additional considerations for supply staff**

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

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- The Headteacher/ Chief Executive Officer will discuss with the agency whether it is appropriate to suspend the supply teacher, 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 local authority designated officer 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**

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

### **Specific actions**

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

- The investigating officer will discuss with the LADO 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 case manager and the school's personnel adviser will discuss with the LADO whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

- If the individual concerned is a member of teaching staff, the investigating officer and CEO will discuss with the LADO whether to refer the matter to the Teacher Regulation Agency (formerly NCTL) 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 pupil/s who made the allegation if they are still attending the school.

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

If a report is:

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

- The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:
  - Who needs to know about the allegation and what information can be shared
  - How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
  - What, if any, information can be reasonably given to the wider community to reduce speculation
  - How to manage press interest if, and when, it arises

## **Record-keeping**

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

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken 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/ trust 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*, we will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to ELT'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/ trust 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

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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 7.6 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 Trust 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 4a: Specific Safeguarding Issues**

### **Pupils missing from education**

- A pupil going missing from education is a potential indicator of abuse or neglect, and such pupil/s are at risk of being victims of harm, exploitation or radicalisation.
- There are many circumstances where a pupil may become missing from education, but some children are particularly at risk. These include children who:
  - Are at risk of harm or neglect
  - 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 pupil who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a pupil leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
- Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.
- If a staff member suspects that a pupil 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 pupil is in immediate danger or at risk of harm.
- The school should have at least two emergency contacts for a pupil.

### **Child criminal exploitation**

- Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
- The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- Indicators of CCE can include a child:
  - Appearing with unexplained gifts or new possessions
  - Associating with other young people involved in exploitation

- Suffering from changes in emotional wellbeing
  - Misusing drugs and alcohol
  - Going missing for periods of time or regularly coming home late
  - Regularly missing school or education
  - Not taking part in education
- If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child sexual exploitation**

- Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.
- The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.
- CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.
- If a member of staff suspects CSE, they will discuss this with the CPL. The CPL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.
- Indicators and signs of sexual exploitation can include a child or young person:
  - Appearing with unexplained gifts or new possessions
  - Associating with other young people involved in exploitation
  - Having older boyfriends or girlfriends
  - Suffering from sexually transmitted infections or becoming pregnant
  - Displaying inappropriate sexualised behaviour
  - Suffering from changes in emotional wellbeing
  - Misusing drugs and/or alcohol
  - Going missing for periods of time, or regularly coming home late
  - Regularly missing school or education, or not taking part in education



## **Domestic abuse**

- The definition domestic abuse captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour.
- Children, as victims in their own right 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.
- Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.
- 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
- The CPL will provide support according to the child's needs and update records about their circumstances.

## **Homelessness**

- Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- The CPL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
- Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

## **Female Genital Mutilation**

- The CPL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.
- Section 7 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 and signs that FGM has already occurred include:
  - A pupil confiding in a professional that FGM has taken place
  - A mother/family member disclosing that FGM has been carried out
  - A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

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

- Potential signs that a pupil may be at risk of FGM include:
  - The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
  - FGM being known to be practised in the girl's community or country of origin
  - A parent or family member expressing concern that FGM may be carried out
  - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
  - A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents 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 CPL.
- The CPL 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 LADO
  - Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
  - Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

## Peer on peer abuse

- Education settings are an important part of the inter-agency framework not only in terms of identifying, evaluating and raising concerns to Children's Services and the Police, but also in the assessment and management of risk that the pupil may pose to themselves and others in the education setting.
- If a pupil causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider:
  - Whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
  - whether the perpetrator has repeatedly tried to harm one or more other pupils; or
  - Whether there are concerns about the intention of the alleged perpetrator.

**All** staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery);
- initiation/hazing type violence and rituals;
- online/ using technology, this can take the form of 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 do not want to receive such content. Also Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime;

**All** staff should be aware that abuse is abuse and peer on peer abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Furthermore, they should *recognise the gendered nature of peer on peer abuse but that all peer on peer abuse is unacceptable and will be taken seriously.*

A recommended tool that that education settings should use is the Sexual Behaviours Traffic Light Tool by the Brook Advisory Service to help professionals; assess and respond appropriately to sexualised behaviour. The traffic light tool can be found at: <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool>

In order to minimise the risk of peer on peer abuse the school:

- Provides a whole school approach with a developmentally appropriate PSHE curriculum which develops pupils understanding of acceptable behaviour and keeping themselves safe
- Have reporting systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued
- Ensure victims, perpetrators and any other child affected by peer on peer abuse will be supported
- Develops robust risk assessments where appropriate
- Have relevant policies in place (e.g. behaviour policy)
- Have recognition that peer-on-peer abuse may be taking place, even if not reported

- Recognise that online safety, including the use of the internet on mobile phones due to its role in peer-on-peer abuse
- That there may be additional barriers when recognising abuse for pupils with SEND
- Staff should also refer to Part five of Keeping Children Safe in Education (DfE 2021) – ‘Child on child sexual violence and sexual harassment’:  
<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

### **Gangs and youth violence**

- We recognise that pupils are vulnerable, at any age, to being drawn into a gang environment and being targeted as perpetrators, or victims, of violence to others;
- We understand the positive impact that education, and spotting and responding to early warning signs of gang behaviour and violence, can have on affecting a positive outcome for a pupil and for building resilience to gang culture;
- We will be vigilant to any signs of our pupils being drawn into, or affected by, gangs and youth violence, and will work with local agencies to safeguard any perpetrators and/or victims.

### **Honour based abuse**

- Honour based abuse is a collection of practices used to control behaviour within families in order to protect perceived cultural and religious beliefs and/or honour.
- Violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.
- Women are predominantly (but not exclusively) the victims, which can be distinguished from other forms of violence, as it is often committed with some degree of approval and/or collusion from family and/or community members.
- Males can also be victims, sometimes as a consequence of their involvement in what is deemed to be an inappropriate relationship, if they are gay, or if they are believed to be supporting the victim.
- Honour based abuse cuts across all cultures, nationalities, faith groups and communities, usually where a culture is heavily male dominated. Relatives, including females, may conspire, aid, abet or participate in honour-based abuse, for what might seem a trivial transgression.

### **Children with special educational needs and disabilities:**

Additional barriers can exist when recognising abuse and neglect in this group of pupils.

This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s impairment without further exploration;
- Assumptions that children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs;
- Communication barriers and difficulties
- Reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled pupil)
- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.
- A disabled pupil’s understanding of abuse.

- Lack of choice/participation
- Isolation

### Private fostering

- Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) (**S.66 Children Act 1989**) is placed for 28 days or more in the care of someone who is not the child's parent(s) or a 'connected person'.
- A connected person is defined as a 'relative, friend or other person connected with a child'. The latter is likely to include person(s) who have a pre-existing relationship with the child, for example, a teacher who knows the child in a professional capacity.
- Private foster carers can be from the extended family, e.g. a cousin or a great aunt, **but cannot be a relative** as defined under the **Children Act 1989, section 105**: '*A relative under the Children Act 1989 is defined as a 'grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or step-parent'.*
- If you meet the definition of a 'connected person', please see our page on **Family and Friends Care**.
- It is imperative that the local authority is notified if a pupil is living with someone who is not their parent or a 'connected person' for longer than 28 days. The local authority needs to be satisfied that the placement is suitable and the pupil is safe. To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous but can include occasional short breaks.

### County lines exploitation

- County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines".
- The gang activity is highly associated with violence, drug dealing and exploitation; having a devastating impact on young people, vulnerable adults and local communities.
- Gangs will use children, and vulnerable people, to move drugs and money, criminally exploiting them (CCE); they will also seek to establish a base in target locations, typically taking over the homes of local vulnerable adults by force or coercion – this is referred to as 'cuckooing'.
- County lines is a major, cross-cutting issue involving and linking into:
  - drugs
  - violence
  - gangs
  - safeguarding
  - criminal and sexual exploitation
  - modern slavery
  - missing persons

The national picture continues to develop but there are recorded cases of:

- Children as young as 12 years old being exploited by gangs to courier drugs out of their local area
- Both males and females 15-16 years is the most common age range
- White British children being targeted as gangs perceive them more likely to evade police detection.
- There is increased use of social media to make initial contact with pupils, 'grooming' them to become involved.

Young people involved in county lines may exhibit some of the signs listed below, either as a member or as an associate of a gang dealing drugs. Any sudden changes in their lifestyle should be discussed with them. Signs to look out for:

- Persistently going missing from school or home and/or being found out-of-area

- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts /phone calls
- Relationships with controlling /older individuals or groups
- Leaving home/care without explanation
- Suspicion of physical assault/unexplained injuries
- Carrying weapons
- Significant decline in school results/performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

### Preventing radicalisation

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

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour. The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views

- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

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

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

### **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, their credentials and reason for visiting will be checked before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in on InVentry and wear a visitor's badge.

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

- will be asked to show their DBS certificate, which will be checked alongside their photo ID;  
or
- the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

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

### **Non-collection of children**

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

- immediately contact the pupil's parent/s or contacts to discuss the reason
- record the time of collection on InVentry
- a member of the Safeguarding Team will take advice from the MASH if a pupil is not collected by the close of school

- where this is an ongoing concern, a member of the Safeguarding Team will discuss the matter with the parent/carer to endeavour to support

### **Missing pupils**

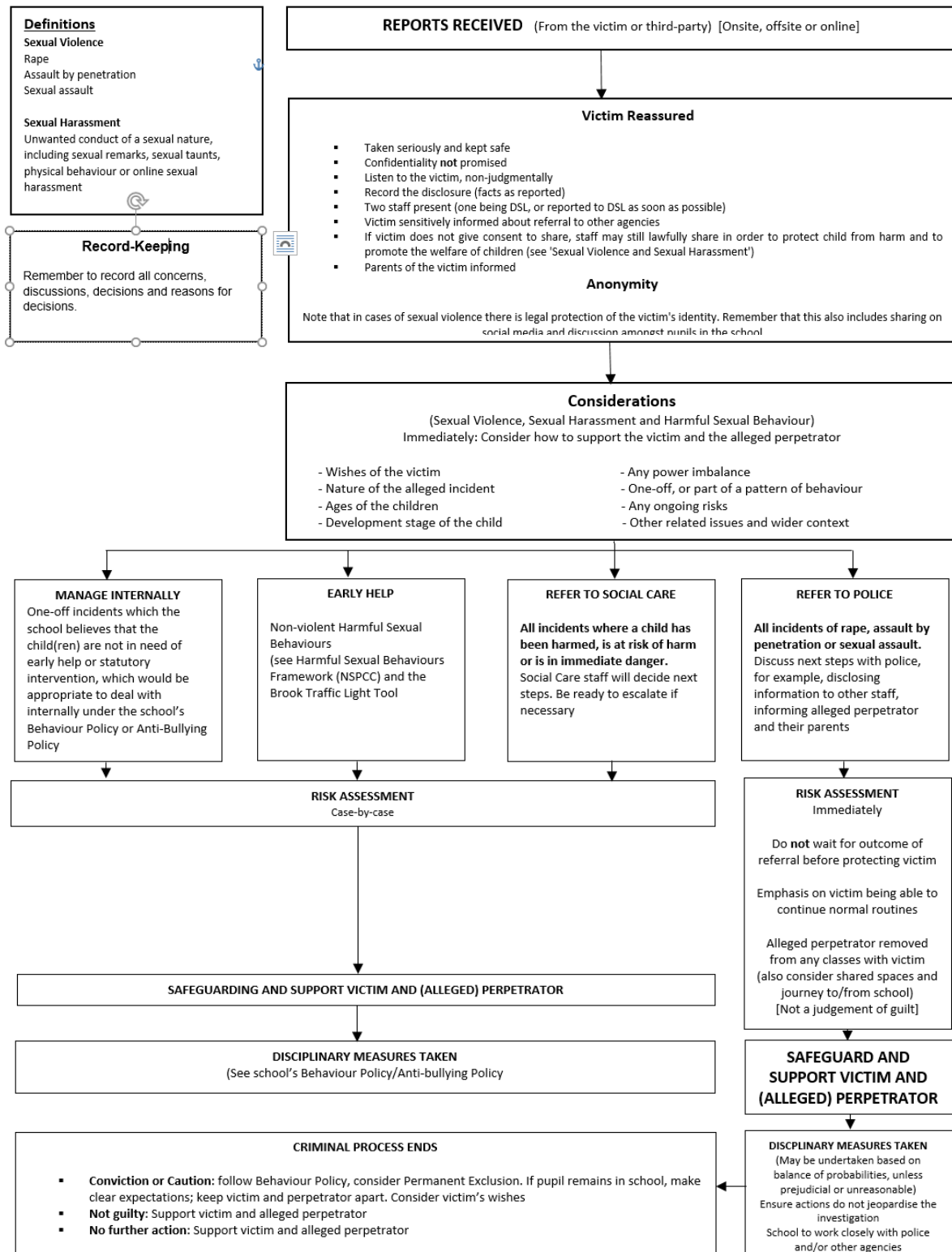
Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- immediately contact the pupil's parent/carer or contacts
- inform the Police
- record all incidents and outcomes



## Appendix 4b

### Response to Reports of Sexual Harassment/ Violence by Pupils



## Appendix 5: TEDDY Acronym



Below is an acronym on how to deal with a conversation of disclosure with a pupil.

### **TEDDY**

- T** - Tell me what happened
- E** - Explain what you mean (so you are clear about people and events)
- D** - Describe what happened
- D** - Do not promise confidentiality
- Y** - Your responsibility is to contact designated staff

### **Procedures**

What to do if someone discloses to you.

A pupil may choose to confide in any member of staff. Please remember:

- Yours is a listening role. Do not interrupt the child if he or she is recalling a significant event. Any questions that may be needed to clarify what the pupil is saying should be framed in an open manner and not lead the pupil in any way.
- Make a note of the discussion on the 'logging a concern' sheet as soon as possible (but within 24 hours). This must include the time, date, place and full names of anyone present as well as what was said – this could be used as evidence.
- Inform the designated member of staff as soon as possible and pass on the completed 'logging a concern' form. They will now take on the responsibility for any further action.
- Do not promise confidentiality. You have to pass this information on.
- If you have any doubts – always speak to a designated member of staff.

Appendix 6:

## Designated Team for Safeguarding

|                          |  |
|--------------------------|--|
| <b>Helen McGovern</b>    | <b>Designated Safeguarding Lead</b>                |
| <b>Amy Fry</b>           | <b>Designated Deputy Safeguarding Lead/CP Lead</b> |
| <b>Elena Erotokritou</b> | <b>Designated Child Protection Deputy</b>          |
| <b>Lynda Hannaford</b>   | <b>Designated Child Protection Officer</b>         |
| <b>Alex Monk</b>         | <b>Link Safeguarding LEC Member</b>                |
| <b>Alex Monk</b>         | <b>Chair of the Trustee Committee SHaW</b>         |

Please contact any of the people above if:

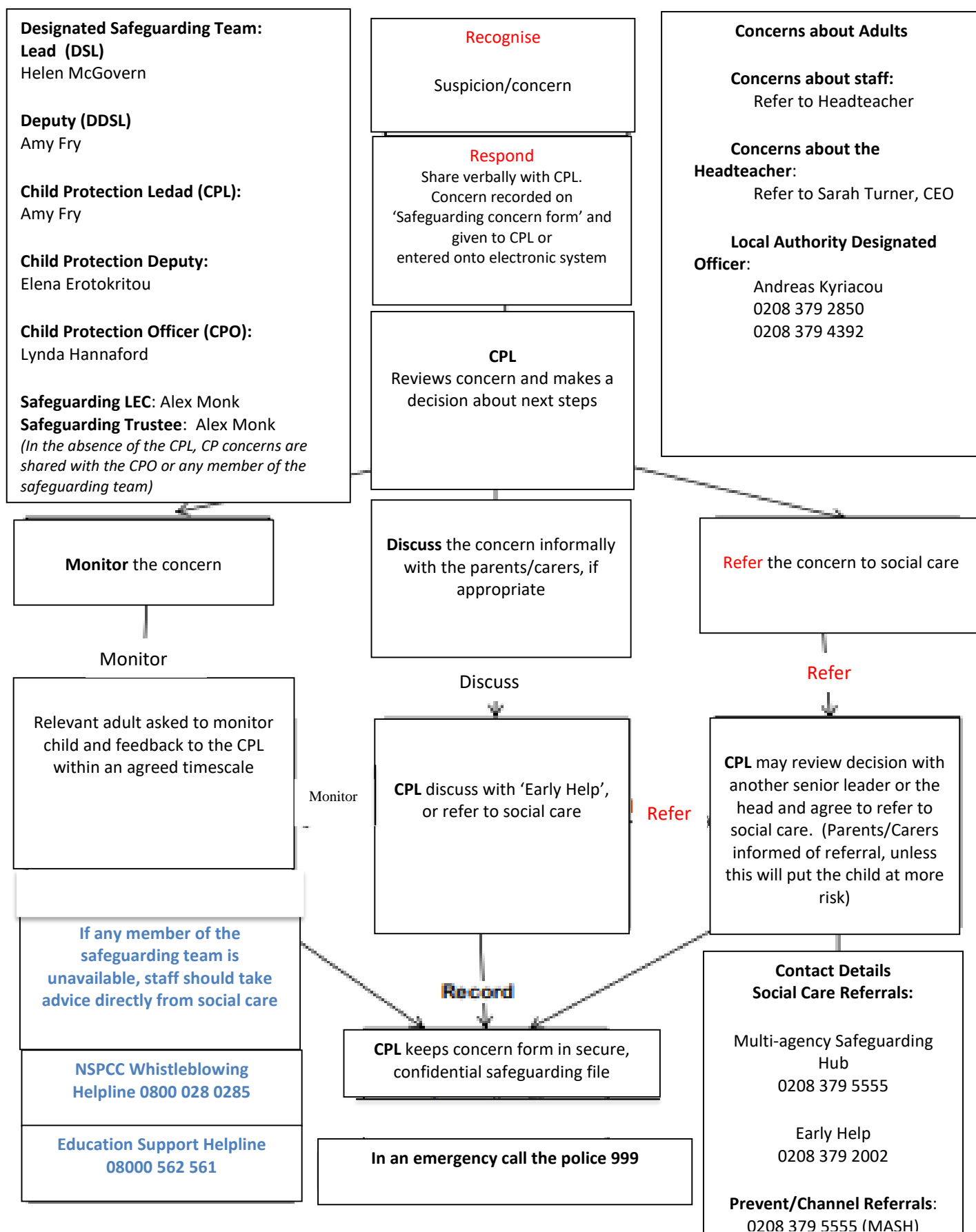
- Any pupil discloses information that causes concern
- You see any unexpected marks on a pupil's body
- If a pupil displays any concerning behaviour

**Please record any concerns/information on the Safeguarding Logging Concern Sheet and hand to one of the above people IMMEDIATELY!**

**PLEASE ALSO REFER TO THE SCHOOL PROCEDURES**

## Appendix 7: Raising a Concern

**Recognise - Respond - Refer**  
Protecting children is everyone's responsibility



## Appendix 8: Training Requirements

| WHAT?   | WHY?                                       | WHEN?  | WHO?  | BY WHO? |
|---|--|--|---|---------|
| <b>Induction Training</b>                                 | Mandatory                                  | Prior to commencing in role  | All members of your staff community (including agency/temporary staff)  |         |
| <b>Awareness Raising Basic Child Protection</b>           | Statutory                                  | 3 yearly basis   | All members of your staff community (including heads and SLT)   |         |
| <b>Designated Safeguarding Lead Training</b>              | Statutory                                  | 2 yearly updates   | Any named member of your Designated Safeguarding Team (lead and deputies)   |         |
| <b>Safer Recruitment Training</b>                         | Statutory                                  | No stipulated time for renewal - best practice 2 yearly              | At least one member of the appointment panel to have undertaken training  |         |
| <b>Training about preventing terrorism</b>                | Statutory                                  | No stipulated time for renewal - as required                         | All staff must have undertaken Prevent awareness training regarding the duty to prevent terrorism                                     |         |
| <b>Training on specific issues: FGM/CSE/Online Safety</b> | Ofsted Inspection framework                | No stipulated time for renewal - best practice 2 yearly              | All staff must have undertaken training on specific issues  |         |
| <b>Annual Child Protection Updates</b>                    | KCSIE guidance                             | Annually   | All staff members should receive safeguarding and child protection updates annually   |         |
| <b>Governing Bodies</b>                                   | KCSIE guidance                             | No stipulated time for renewal - best practice 2 yearly              | Governing bodies must ensure they comply with their duties under legislation  |         |
| <b>Online Safety Awareness</b>                            | KCSIE guidance/Ofsted Inspection Framework | Annual basis - best practice<br>Pupil Awareness/<br>Parent Awareness | Staff and pupils - understand risks posted by adults or peers who use the internet and strategies are covered to keep themselves safe |         |

## Appendix 9: COVID-19 School Closure Arrangements for Safeguarding and Child Protection at Carterhatch Junior School

| Version and Date |            | Action/Notes   | Date Written     | Date to be Reviewed |
|------------------|------------|----------------|------------------|---------------------|
| 2.0              | 13.07.2021 | Approved by TB | Update July 2021 | 1 Year – 2021       |

### Context

As from the 20th March 2020 parents were asked to keep their children at home, wherever possible, and for schools to remain open only for those children of workers critical to the COVID-19 response - who absolutely need to attend.

Schools and all childcare providers were asked to provide care for a limited number of children - children who are vulnerable, and children whose parents are critical to the COVID-19 response and cannot be safely cared for at home.

This addendum of the Bowes Primary School Safeguarding, and Child Protection policy contains details of our individual safeguarding arrangements in the following areas:

1. Context
2. Vulnerable Children
3. Attendance Monitoring
4. Designated Safeguarding Lead
5. Reporting a Concern
6. Safeguarding Training and Induction
7. Safer Recruitment/Volunteers and Movement of Staff
8. Online Safety in Schools and Colleges
9. Children and Online Safety Away from School and College
10. Supporting Children Not in School
11. Supporting Children in School
12. Peer on Peer Abuse
13. Support from the Multi-Academy Trust

## Key Contacts

| Role   | Name            | Email  |
|--|-----------------|--|
| <b>Designated Safeguarding Lead/ Headteacher</b> | Helen McGovern  | <a href="mailto:enquiries@carterhatchjunelt.org">enquiries@carterhatchjunelt.org</a>                   |
| <b>Deputy Designated Safeguarding Lead</b>       | Amy Fry         | <a href="mailto:enquiries@carterhatchjunelt.org">enquiries@carterhatchjunelt.org</a>                   |
| <b>Child Protection Lead (CPL):</b>              | Amy Fry         | <a href="mailto:enquiries@carterhatchjunelt.org">enquiries@carterhatchjunelt.org</a>                   |
| <b>Safeguarding LEC:</b>                         | Alex Monk       | <a href="mailto:Alex.monk@enfieldlearningtrust.org">Alex.monk@enfieldlearningtrust.org</a>             |
| <b>Safeguarding Trustee</b>                      | Alex Monk       | <a href="mailto:Alex.monk@enfieldlearningtrust.org">Alex.monk@enfieldlearningtrust.org</a>             |
| <b>Chair of Trustees</b>                         | John West       | <a href="mailto:John.west@enfieldlearningtrust.org">John.west@enfieldlearningtrust.org</a>             |
| <b>Chair of Local Education Committee</b>        | Alex Monk       | <a href="mailto:Alex.monk@enfieldlearningtrust.org">Alex.monk@enfieldlearningtrust.org</a>             |
| <b>Chief Executive Officer</b>                   | Sarah Turner    | <a href="mailto:Sarah.turner@enfieldlearningtrust.org">Sarah.turner@enfieldlearningtrust.org</a>       |
| <b>Deputy Chief Executive Officer</b>            | Androulla Nicou | <a href="mailto:Androulla.nicou@enfieldlearningtrust.org">Androulla.nicou@enfieldlearningtrust.org</a> |

**Carterhatch Junior School Tel: 0208 804 2101**

### Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans.

Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

Eligibility for free school meals in and of itself should not be the determining factor in assessing vulnerability.

Senior leaders, especially the Designated Safeguarding Lead (and deputy) know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children's social care support.

The school will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. **The lead person for this will be:** Amy Fry.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and the school will explore the reasons for this directly with the parent.

Where parents are concerned about the risk of the child contracting COVID19, Bowes or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England. school name will encourage our vulnerable children and young people to attend a school, including remotely if needed.

### **Attendance Monitoring**

Local authorities and education settings do not need to complete their usual day-to-day attendance processes to follow up on non-attendance.

The school and social workers will agree with parents/carers whether children in need should be attending school. The school will then follow up on any pupil that they were expecting to attend, who does not. The school will also follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend.

To support the above, the school will, when communicating with parents/carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

In all circumstances where a vulnerable child does not take up their place at school, or discontinues, the school will notify their social worker.

### **Designated Safeguarding Lead**

The school has a Designated Safeguarding Lead (DSL) and a Deputy DSL.

|   |                             |
|---|-----------------------------|
| The Designated Safeguarding Lead is:        | Helen McGovern, Headteacher |
| The Deputy Designated Safeguarding Lead is: | Amy Fry, Deputy Headteacher |
| Child Protection Lead:                      | Amy Fry, Deputy Headteacher |
| Designated Child Protection Deputy:         | Elena Erotokritou           |
| Designated Child Protection Officer:        | Lynda Hannaford             |

The optimal scenario is to have a trained DSL (or deputy) available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via phone or online video - for example when working from home.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site.

This might include updating and managing access to child protection online management system, in Google drive and liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college.

It is important that all school staff and volunteers have access to a trained DSL (or deputy). On each day staff on site will be made aware of that person is and how to speak to them.



The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

### **Reporting a Concern**

Where staff have a concern about a child, they should continue to follow the process outlined in the school Safeguarding and Child Protection Policy, this includes making a report on a pupil concern form, which can be done remotely or through an electronic system.

In the unlikely event that a member of staff cannot access the correct form, they should email the Designated Safeguarding Lead, Headteacher. This will ensure that the concern is received.

Staff are reminded of the need to report any concern immediately and without delay even if they feel it is low-level. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’, that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Where staff are concerned about an adult working with children in the school, they should report the concern to the Headteacher. If there is a requirement to make a notification to the Headteacher whilst away from school, this should be done verbally and followed up with an email to the Headteacher.

Concerns around the Headteacher should be directed to the Chief Executive Officer: Sarah Turner.

The Multi-Academy Trust will continue to offer support in the process of managing allegations.

### **Safeguarding Training and Induction**

All existing school staff have had safeguarding training that includes online safety training that is integrated, aligned and considered as part of the whole school or college safeguarding approach. This is part of the wider staff training and curriculum planning. The CPD programme is reviewed to ensure that all the knowledge staff need is included and that they understand how it is to be implemented. Training can include online training.

All staff receive annual updates and have read and understood the part 1 of Keeping Children Safe in Education (2021). As part of the annual update, the DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a pupil.

Where new staff are recruited, or new volunteers start at the school, they will continue to be provided with a safeguarding induction.

If staff are deployed from another education or children’s workforce setting to our school, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:

- the individual has been subject to an enhanced DBS and children’s barred list check
- there are no known concerns about the individual’s suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

For movement within the Trust, schools should seek assurance from the Headteacher of the school the member of staff is coming from.

Upon arrival, they will be given a copy of the receiving setting's safeguarding and child protection policy, confirmation of local processes and confirmation of DSL arrangements.

### **Safer Recruitment/ Volunteers and Movement of Staff**

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the school will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2019) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

If the school are utilising volunteers, the school will continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

The school will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE.

The school will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral.

During the COVID-19 period all referrals should be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk)

Whilst acknowledging the challenge of the current National emergency, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the school will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

### **Online Safety in Schools**

The school will continue to provide a safe environment, including online. This includes the use of an online filtering system. Where students are using computers in school, appropriate supervision will be in place.

### **Pupil and Online Safety Away from School**

It is important that all staff who interact with pupils, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding and Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Staff will not engage with video calling, except where it has been agreed by the Headteacher in advance for checking in with vulnerable pupils. Staff will communicate with pupils via a school owned device and through school platforms.

Online teaching should follow the same principles as set out in the MAT code of conduct.

The school will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons or video calling especially where webcams are involved:

- No 1:1s, groups only
- Staff and children must wear suitable clothing, as should anyone else in the household
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred
- The live class should be recorded in advance so that if any issues were to arise, the video can be reviewed
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day
- Language must be professional and appropriate, including any family members in the background
- Staff must only use systems approved by the school to communicate with pupils
- Staff should record, the length, time, date and attendance of any sessions held
- Video calls should be agreed with the pupils' parent in advance
- Two members of staff should be included in a video call to ensure safeguarding of all parties

### **Supporting Pupils Not in School**

The school is committed to ensuring the safety and wellbeing of all its children and young people.

Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person.

Details of this plan must be recorded on in the safeguarding Google drive, as should a record of contact have made.

The communication plans can include; remote contact, phone contact, door-step visits. Other individualised contact methods should be considered and recorded.

The school and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.

The school will share safeguarding messages on its website and social media pages.

The school recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents/carers. Teachers at the school need to be aware of this in setting expectations of pupils' work where they are at home.

The school will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and recorded on pupil concern form which will be in the google drive password protect documents.

### **Supporting Children in School**

The school is committed to ensuring the safety and wellbeing of all its pupils.

The school will continue to be a safe space for all children to attend and flourish. The Headteacher will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety.

The school will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19.

The school will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and recorded in the google drive.

Where the school has concerns about the impact of staff absence – such as our Designated Safeguarding Lead or first aiders – will discuss them immediately with the Trust.

### **Peer on Peer Abuse**

The school recognises that during the closure a revised process may be required for managing any report of such abuse and supporting victims.

Where a school receives a report of peer on peer abuse, they will follow the principles as set out in the KCSIE document and of those outlined within of the Safeguarding and Child Protection Policy.

The school will listen and work with the young person, parents/carers and any multiagency partner required to ensure the safety and security of that young person. Concerns and actions must be recorded on pupil concern form or via electronic system and appropriate referrals made.

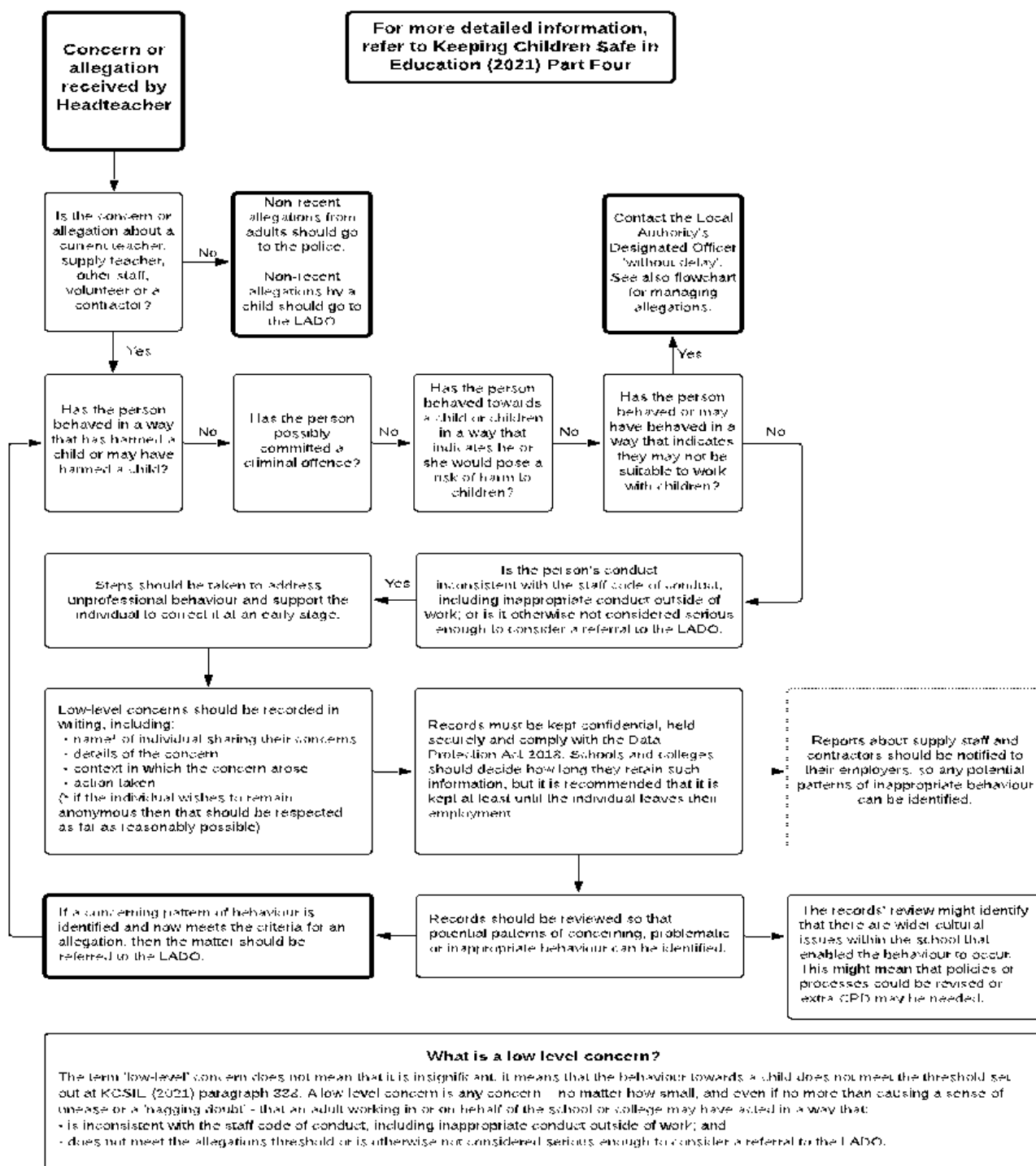
### **Support from the Multi-Academy Trust**

The Multi-Academy Trust (MAT) will provide support and guidance as appropriate to enable the DSL to carry out their role effectively. This includes support, guidance and direction.

The MAT will also provide regular group and individual supervision sessions if required. This may take the form of an online meeting.

## Appendix 10: Managing Low Level Concerns

### Managing low level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors



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This policy will be reviewed on an annual basis by the Board of Trustees.

|                                 |                                       |
|---------------------------------|---------------------------------------|
| Signature of Chair of Trustees: | Signature of Chief Executive Officer: |
|---------------------------------|---------------------------------------|

