



Child Protection and Safeguarding Policy

Policy approved by Trustees: 2nd September 2021

Effective from: September 2021. Reviewed at least annually.

SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN IS EVERYONE'S RESPONSIBILITY

Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. If you have concerns about risk to a child, **you should report it immediately**. Section 6 of this policy sets out the process for reporting and recording concerns. Where a child is in **immediate danger or at risk of harm**, a referral to **children's social care** (and if appropriate the police) must be made immediately. **This guidance applies in its entirety to all schools in the trust.**

Essential school-specific safeguarding information and contacts:

School name	Belleville Primary School	Belleville Wix Academy	The Alton Primary School	Churchfields Primary School
Designated Safeguarding Lead (DSL)	Sarah Atherton	Sarah Bevin	Ruth Hudson	Sally White
Designated Members of Staff (DMS)	Mary Lyne Latour Laura Britten Hannah Coles Megan Shaw Vicki Brand Suzette Coleman Simon Hudd Gus Brooks Joanne Sultan Sarah Peach Ellie Thompson	Seana Henry Alex Williams Matthew Gale Matthew Hutton-Attenborough Dermot Mullin Stacey Malinowski	Linsay Thomson Emma Morris Helen Gibbs Tom Clarke	Tom Hyndley Jean Baker Andrew Harper Colin Matthews Claire Fowler
Designated teacher for Looked After Children	Vicki Brand	Sarah Bevin	Linsay Thomson	Sally White
Online safety coordinator	Rachel Carruthers	Sarah Bevin	Linsay Thomson	Liz Williams
Designated teacher for Mental Health	Vicki Brand Rachel Carruthers	Sarah Bevin	Linsay Thomson	Sally White
Prevent Lead	Sarah Atherton	Sarah Bevin	Ruth Hudson	Sally White
Local Governor(s) for Safeguarding	Paloma Belaunde Jessica Silvester	Rachael Dupont	Geoff Morris	Karen Parkinson Lucy Rosser
Trustee for safeguarding:	Rachael Dupont			
Children's social care	Wandsworth Multi Academy Safeguarding Hub (MASH) mash@wandsworth.gov.uk 020 8871 6622. Monday to Friday, 9.00am to 5.00pm Out of hours service: 020 8871 6000 Lambeth (neighbouring borough): First Response Team 020 79265555, email helpandprotection@lambeth.gov.uk		Bromley Multi Academy Safeguarding Hub (MASH) mash@bromley.gov.uk 0208 461 7373 /7379 /7026 Mon to Fri, 8.30am to 5pm Out of hours: 0300 3038671	
Local Authority Designated Officer (LADO)	Anita Gibbons 020 8871 7440 LADO@richmondandwandsworth.gov.uk LADO referral form: www.wandsworth.gov.uk/downloads/file/12805/lado_referral_form		Gemma Taylor 0208 461 7669 or 0208 313 4325 lado@bromley.gov.uk LADO referral form: https://www.bromleysafeguarding.org/articles.php?id=604	
Virtual school head for looked after children	Nova Levine 020 8871 7348 nlevine@wandsworth.gov.uk		Helen Priest 020 8313 4474 virtual.school@bromley.gov.uk	
PREVENT Contact	Ameliah Rayn; Mobile: 07583 77 5081; prevent@richmondandwandsworth.gov.uk ;		Rob Vale; 0208 284 8776; prevent@bromley.gcsx.gov.uk ;	
Lycée (BWA)	Simon McNaught 0207 5906811/ 07814053463 smcnaught@Lyceefrançais.org.uk			

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1. Introduction

SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN IS EVERYONE'S RESPONSIBILITY

Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child and the child's wishes and feelings.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. The Trustees of the Quality First Education Trust fully recognise the responsibilities and duties placed on them to have arrangements to safeguard and promote the welfare of all pupils in the schools within the Trust. We believe that the Trust's schools provide a caring, positive, safe and stimulating environment in which pupils can learn and that promotes the social, physical and emotional wellbeing of each individual pupil. We recognise that all staff (regardless of employment status), including volunteers, have a full and active part to play in protecting pupils from harm.

All staff, governors and trustees are required to:

- Read this policy carefully and to be aware of their role in these processes.
- Read relevant parts of Keeping Children Safe in Education 2021 (see Appendix A)

The school will ensure that:

- New staff are informed of safeguarding requirements and this policy during their induction.
- Staff are provided with, have read and have understood Part One and Annex A of Keeping Children Safe in Education 2021.
- Staff are provided with appropriate training in Child Protection and Safeguarding issues and systems, including the Early Help process.
- Staff are informed who the Designated Safeguarding Lead (DSL) and Designated Members of Staff (DMS) are in their school.
- Staff are assisted to discharge their roles and responsibilities in relation to this policy.
- The DSL and DMS are released to attend the necessary enhanced training courses.

This policy is written in line with:

- Principles established by the Children Act (1989, 2004) and Children and Family's Act 2014)
- Keeping Children Safe in Education (DfE 2021)
- Working Together to Safeguard Children (HM Government, 2018)
- Statutory Framework for the Early Year's Foundation Stage (DfE, 2017)
- What to do if you are worried a child is being abused (HM Government, 2015)
- Children and Social Work Act 2017
- Help, protection, education: concluding the Children in Need review June 2019
- Education and Training (Welfare of Children) Act 2021
- Sexual violence and sexual harassment between children in schools & colleges (DfE 2018)

Our procedures will also refer to locally agreed inter-agency procedures put in place by the Local Safeguarding Children Partnership, recent child safeguarding practice reviews and Ofsted reviews. Links to other useful guidance can be found in Appendix A.

Other policies to be considered alongside this policy include:

- Q1E policies: Online Safety; Health & Safety; Whistleblowing; Recruitment; Disclosure and Barring Service; Emergency; Data Protection; Covid-19 Addendum to Safeguarding Policy.
- The school's policies for: Behaviour; Positive Handling; Special Educational Needs and Disabilities; Anti-Bullying; Confidentiality; Intimate Care; Trips; Absence; Emergencies.

Throughout this policy, child/children refers to anyone under the age of 18.

2. Aims of this policy

- To raise the awareness of all staff of the need to safeguard all children and of their responsibilities in identifying and reporting possible cases of abuse.
- To emphasise the need for good communication between all members of staff in matters relating to child protection.
- To create a culture where staff feel able to raise concerns in a real/virtual world which may affect the safety of children.
- To set out a structured procedure which will be followed by all members of the school community in cases of suspected abuse.
- To provide a systematic means of monitoring children in need and children known or thought to be at risk of suffering significant harm.
- To work openly and in partnership with parents/carers in relation to child protection concerns.
- To support all pupils' development in ways that will foster security, confidence and independence.
- To promote safe practice and challenge poor and unsafe practice.
- To develop and promote effective working relationships with other agencies involved with safeguarding and promoting the welfare of children.
- To develop and promote online safety awareness amongst staff and children (including use of mobile phones).
- To develop and promote awareness of safeguarding regarding Grooming, Child Sexual Exploitation and Female Genital Mutilation.
- To develop and promote awareness of safeguarding regarding radicalisation and risk of being radicalised.
- To ensure that all adults working within our school have completed all required checks to confirm their suitability to work with children.
- To integrate opportunities into the curriculum for children to develop the skills they need to recognise and stay safe from abuse, allowing for continuity and progression through the key stages.
- To take account of and inform policy in related areas, such as: anti-bullying; discipline and behaviour; health and safety; online safety; children missing education; child sexual exploitation; peer on peer abuse; female genital mutilation (FGM); honour based abuse; anti-radicalisation (PREVENT); serious youth violence, including knife crime; de-escalation and positive handling procedures, procedures for dealing with allegations against staff and safer recruitment practice.
- To comply with core responsibilities expected of the school as a relevant agency to the multi-agency safeguarding arrangements in the school's relevant Local Authority (LA) as set out in the LA's Safeguarding Children Partnership published arrangements.

3. Key Principles

- We believe that all children have a right to be protected from harm and /or abuse whilst in and out of school care, in person or via the internet.
- We recognise that abuse and neglect are complex issues and rarely stand-alone events. We recognise that schools require a culture of vigilance, professional curiosity, respectful challenge and effective recording and monitoring systems. Safeguarding incidents could happen anywhere and staff should be alert to possible concerns being raised in school.
- We recognise that abuse occurs in all cultures, religions and social classes and that staff need to be sensitive to the many differing factors which need to be taken into account depending on the child's cultural and social background. However, we also recognise that the **needs of the child are paramount** and any concerns will be referred on appropriately, whatever the family background of the child concerned. We recognise that both mental and physical health are relevant to safeguarding and the welfare of children.
- We recognise that because of the day to day contact with children, school staff are extremely well placed to observe outward signs of abuse.
- We recognise that a child who is abused or witnesses abuse or violence may find it difficult to develop and maintain a sense of self-worth. They may feel helpless and humiliated and may feel self-blame.
- We recognise that school may provide the only stability in the lives of children who have been abused or are at risk of harm.
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived as normal to that which is overtly aggressive, disturbed or withdrawn. We know that it is important that children feel secure, are encouraged to talk and are sensitively listened to, and that children know that there are adults in school whom they can approach if they are worried or unhappy.
- We acknowledge that there may be occasions where it may be appropriate to consider whether specific or additional arrangements need to be put in place where an issue is particularly sensitive due to gender issues or cultural or faith issues. If possible, in cases of sexual abuse in particular, we will try to ensure that a pupil can be spoken to by a same sex member of staff who has received enhanced training if this is felt to be appropriate.
- We adhere to the principles of working in partnership with those who hold parental responsibility for each child. Staff will raise Child Protection or Safeguarding concerns with Parents/Carers at the earliest appropriate opportunity and work in partnership with them and other agencies to improve outcomes.
- The prime concern at all times must be the welfare and safety of the child. Where there is a conflict between the needs of the child and the parent/carer, the **interests of the child must be paramount**.
- We recognise that all child on child abuse is unacceptable
- The ethos of our Trust supports open practice, good communication and a safe culture in which children can thrive and learn.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the relevant school leadership team, local governors and Trustees.

4. Safeguarding Code of Conduct for staff and volunteers

ALWAYS:

- ✓ give the highest possible standard of service to pupils and parents, and where it is part of your duties, provide appropriate advice to other staff/volunteers/governors;
- ✓ report any impropriety or breach of procedure;
- ✓ share information when it is required in the best interests of the child;
- ✓ treat all children, regardless of race, disability, religion or belief, gender, sexual orientation equally and with respect and dignity;
- ✓ ensure the child's welfare comes first and record and pass on any concerns to the Designated Safeguarding members of staff as soon as possible;
- ✓ ensure children feel heard and understood, by listening to them and taking account of their wishes and feelings, understanding the difficulties they may have in approaching you about their circumstances, and considering how to build trusted relationships;
- ✓ work in an open environment: avoid private or out of sight locations, encourage open communication and where appropriate keep doors open;
- ✓ speak clearly, without whispering, so that children do not need to come too close to hear;
- ✓ avoid spending time alone with individual children unless necessary or unavoidable;
- ✓ ensure there is another adult in the vicinity, who is aware of the task, if changing a child who has wet or soiled themselves (and refer to the intimate care policy);
- ✓ when having a meeting with a child/parent/carer, ideally sit facing the door so that this can be monitored and help given if necessary;
- ✓ be aware of the impact of proxemics; maintain safe and appropriate distance; know where and how to place your body;
- ✓ avoid touching children and if a child seems uncomfortable: stop. (N.B. if touching is necessary as part of positive handling, verbalise to the child what you are doing);
- ✓ present as an exemplary role model by not smoking, drinking alcohol, swearing, allowing suggestive conversations or dressing less than professionally when in company of a pupil;
- ✓ seek to be enthusiastic and constructive in giving feedback, not overly negative /critical;
- ✓ record any injury that occurs and seek attention from a qualified First Aider or parent/carer;
- ✓ use social media carefully: check your privacy settings regularly, and think before you post or 'like' content which may bring your school into disrepute;
- ✓ be aware of where you are and what you are doing, when wearing school or trust branded clothing, to ensure you do not bring the school or trust into disrepute;
- ✓ carefully consider the impact of other additional appointments or employments, to rule out the possibility of an adverse effect on your work or the interests of the school or trust;
- ✓ inform the headteacher of any caution, conviction or criminal charges brought during your employment, or if you are subject to any police investigation.

NEVER:

- x allow allegations made by a child to go unrecorded or not acted upon swiftly (this applies to any form of abuse or bullying)
- x pass off any form of discriminatory abuse (sexual, racial, religious) as 'banter' or 'just part of growing up'
- x promise confidentiality to a child making an allegation or disclosure
- x withhold information that may impact the safety of a child or put someone at risk
- x lock doors so that children cannot leave the room
- x impose humiliating or power-based punishments or intentionally reduce a child to tears;
- x engage in rough, physical or sexually proactive games, including horseplay;
- x allow or engage in any form of inappropriate touching;
- x share a bedroom with a pupil;
- x make sexually suggestive comments to a young person;
- x engage in any form of relationship, sexual or otherwise, with a young person you work with even if they are over the age of consent, but under 18 (older with vulnerable adults);
- x do things of a personal nature for children that they can do for themselves;
- x invite or allow children to stay with you at your home unsupervised;
- x share private email addresses with pupils;
- x 'friend' a child on Facebook or any other social networking sites – particularly current and former pupils and their siblings;
- x keep photographs or videos of pupils on your phone (if you need to take photos or videos of a child for school use, you should upload them onto school system as soon as possible and then delete them from your own device);
- x seek physical contact. Try to gently discourage contact rather than reject pupils. Never allow physical contact when you are alone. Model appropriate contact, e.g. shaking hands or patting the shoulder.
- x pick up or carry a child unless unavoidable in an emergency (i.e. they are in danger and incapable of moving away themselves)
- x sit children on your lap; if a child needs comforting sit them alongside you;
- x offer a lift to or take a pupil in your car, but where this is unavoidable:
 - prepare a risk assessment
 - ensure your insurance covers business passengers (N.B. this may be a very good reason for not being able to take pupils in your car)
 - obtain parental permission, preferably in writing
 - take more than one person
 - sit child in the back
 - travel directly to the destination
 - keep conversation professional.

5. Definitions

The following definitions are based on Keeping Children Safe in Education 2021.

Please also refer to the potential signs of abuse set out in Appendix C to this policy, though it is important to recognise that some young people who are being abused do not exhibit any external signs of this abuse.

- **Safeguarding and promoting the welfare of children** is defined for the purposes of this guidance as:
 - protecting children from maltreatment;
 - preventing impairment of children's mental and physical health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.
- **Children** includes everyone under the age of 18.
- **Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse is broadly divided into four categories: Physical Abuse, Sexual Abuse, Emotional Abuse and Neglect. The definitions are given below. Guidance for recognising the indicators of possible abuse are attached as Appendix C to this policy.
- **Physical abuse:** A form of abuse which 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.
- **Sexual abuse:** involves forcing or enticing a child or a 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 (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching inside or outside of clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Emotional abuse:** The persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. It 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child although it may occur alone.

- **Neglect:** 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, for example, 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 use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Specific safeguarding issues:** See section 16 for definitions and details of the school's approach (where relevant) to the following specific safeguarding issues:
 - Female genital mutilation (FGM)
 - Preventing Radicalisation, extremism and terrorism
 - Domestic abuse
 - Child Sexual Exploitation (CSE), Sextortion and Child Sexual Abuse (CSA)
 - Child Criminal Exploitation (CCE) (including grooming & trafficking)
 - Online Safety
 - Children who harm other children (Peer on peer abuse) including involvement in criminal activities and serious youth violence, including knife crime.
 - Sexual violence and sexual harassment (including child on child) including upskirting
 - Youth produced sexual imagery and the sharing of nude and semi-nude images (previously known as sexting)
 - Fabricated and induced illness
 - Children missing from home or care
 - Children missing from education (CME)
 - Children and court system
 - Children with family members in prison
 - Homelessness
 - County lines
 - HBA (Honour Based Abuse)
 - Forced Marriage
 - Breast Ironing
 - Impact of substance misuse
 - Cultural/faith practices that may cause risk/harm (e.g. witchcraft)
 - Young Carers
 - Children in Care
 - Private Fostering
 - Mental Health

6. Procedures

We ensure our procedures are in line with government policy and we make every effort to align with the locally agreed inter-agency procedures put in place by the Local Safeguarding Children Partnership.

6.1 What to do if you are concerned about a child

All staff have a responsibility to safeguard and promote the welfare of all pupils at all times. If you have a concern about a pupil, you are required to act appropriately to ensure action can be taken to protect them. The concern may arise as a result of a disclosure from a pupil, a parent or a third party or due to their behaviour.

If a pupil discloses abuse:

- Listen carefully to what the pupil is telling you without interrupting
- Do not promise confidentiality
- Remain non-judgemental and keep an open mind
- Do not ask leading questions, or more questions than you have to – just establish what the pupil is telling you
- Be honest with the pupil and explain what you will happen next
- Record the information fully
- Pass on to the designated member of staff (DMS)

Victims should be taken seriously, kept safe, and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

Record any information clearly: In the case of any concerns always record the information clearly and be clear how the concern has arisen. All verbal conversations should be written up as soon as possible. Written records must be kept securely, noting all concerns, discussions and decisions, and the reason for those decisions and any outcomes of actions or referrals or social care involvement.

Report promptly: In all cases you must report any concerns to the DSL or DMS promptly. This includes any concerns of a child believed to be or suspected of being “at risk” of FGM or extremism or radicalisation. NB/ It is important to note that children may not find it easy to tell staff about their abuse verbally. Professional curiosity is important in the absence of a verbal disclosure and if staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

Act quickly: It is important to identify any concerns about children **at as early a stage as possible** so that their needs can be identified and monitored and appropriate support put in place. We will ensure the immediate safety of any child felt to be at serious risk by taking appropriate action and by involving other relevant agencies as necessary.

Ask for advice: Please remember the DSLs and DMSs are available to offer help, advice and guidance to staff and pupils where necessary. If you have a concern or problem and are unclear how to proceed, ask for advice.

Support: In all cases ensure ongoing support is offered to the pupil as appropriate.

Refer directly if you need to:

- All staff know that they may raise concerns directly with the local authority Children's Social Care services, Child Line, the NSPCC, PREVENT- **anybody** with a concern about a child's welfare **should make a referral**.
- **If you think a child is at immediate risk of significant harm, phone the Police. Guidance of when to call the police can be found in** 'When to call the police' produced by the National Police Chiefs Council (NPCC) (Appendix A). (NB. This NPCC advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.)
- See the table on the front page for your school's specific names and contact details; see Appendix A of this document for other useful numbers.

6.2 Co-operating with other agencies and information sharing

- Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.
- School staff will be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.
- The DSL and DMS should liaise with the local authority and work with other agencies in line with *Working Together to Safeguard Children 2018*.
- If a DSL/DMS requires advice, they will contact the Education Safeguarding Advisor or children's social care, or (after hours) a duty social worker.
- When considering referrals to support agencies, our school will act in accordance with Local Safeguarding Children Partnership thresholds for Intervention guidance, which is consistent with the London-wide Continuum of Need thresholds.
- We will refer any child believed to have suffered or to be likely to suffer significant harm to the relevant children's social care team without delay, and will follow up any such referral in writing within 48 hours, unless the children's social care team formally advise not to do so.
- We will contribute to multi-agency assessments of children's needs where appropriate and work in a fully integrated way with other relevant services as appropriate.
- Information will be shared in accordance with the General Data Protection Regulation (GDPR). NB: The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
- We will develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters, including attendance at child protection case conferences wherever possible and providing reports as a matter of course (model format attached in Appendix E).
- If a child's situation does not appear to be improving, or a school is not satisfied with the input from Children's Services, the school will take responsibility for finding out what is happening and keep pressing for action to be taken.
- Multi-Agency Public Protection Arrangements: Many of the agencies subject to the section 11 duty are members of the Multi-Agency Public Protection Arrangements (MAPPA), including the police, prison and probation services. MAPPA should work together with duty to co-operate (DTC)64 agencies to manage the risks posed by violent and sexual offenders

living in the community in order to protect the public and should work closely with the safeguarding partners over services to commission locally.

- The three safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups) have published arrangements to work together as Local Safeguarding Children Partnerships with relevant agencies (as they consider appropriate) to safeguard and protect the welfare of children in the area, including schools and other educational providers. Details of the Local Safeguarding Children Partnership are included on the school website and Appendix A.

6.3 Children Subject to Child Protection Plans:

- A specific request for any Child Protection Information will be made in writing for every child transferring into our school from another school. Schools will make every effort to ensure the previous school provides the required information.
- The child's social worker will be notified of any pupil subject to a Child Protection Plan who is absent from school without explanation for more than one day.
- Any new concern or relevant information about a child subject to a Child Protection Plan will be passed to the child's allocated social worker without delay.
- If a child subject to a Child Protection Plan leaves a school, records will be transferred to the child's new school without delay and the child's social worker informed of the change. Any retention of records will be undertaken in line with data protection legislation. The DSL will ensure the school knows who its cohort of children who currently need a social worker are, understanding their academic progress and attainment and maintaining a culture of high aspirations for this cohort.
- The school will promote educational outcomes by sharing information with teachers and school leadership staff about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced.

A child's need for a social worker

- Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.
- Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

6.4 Online Safety

- We will ensure that all staff and children are made aware of online safety risks and procedures and that that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face.
- Staff will be aware of the Q1E online safety policy and additional guidance in KCSIE 2021.

- Staff will be aware that in many cases abuse will take place concurrently via online channels and in daily life.
- Children can also abuse their peers online. 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.
- We are aware of risks to children online and will ensure children are safeguarded in school from potentially harmful and inappropriate online material through appropriate filtering and monitoring systems.
- We acknowledge that, as well as providing a variety of positive opportunities, the use of technology has become a significant component of many safeguarding issues, and can provide the platform that facilitates exploitation of children and young people. The breadth of issues within the area of online safety are considerable but can be classified into three key areas of risk:
 - Content: being exposed to illegal, inappropriate or harmful material
 - Contact: being subjected to harmful online interaction with other users
 - Conduct: personal online behaviour that increases the likelihood of, or causes, harm – such as sending explicit images, online sexual abuse or online bullying.

This includes dangers and risks involved with online chatting, social media, sharing youth produced sexual imagery (sexting), sextortion (the threat to reveal intimate images to get you to do something you don't want to do), radicalisation, grooming, gambling and gaming (including risks involved in electronic sports) - see Teaching Online Safety Guidance DfE June 2019.

- Children's use of devices is monitored as per the Acceptable Use of ICT Policy. This includes use of computers, iPads and mobile phones.
- Children are expected to hand in mobile phones at the start of the day.
- Each school has an online safety coordinator, named on the front page of this policy.
- Where children are required to learn online at home, the school will ensure this is able to be done safely, following advice from the relevant policies and the Department for Education.

6.5 Searching, Screening and Confiscation (refer to DfE 2018 - Guidance link in Appendix A)

- With consent, staff can search for any item within a child's clothing or equipment.
- Without consent, the headteacher (or a member of staff authorised by the headteacher) can carry out a search for knives, weapons, alcohol, illegal drugs, stolen items, tobacco, fireworks or pornographic images, and any item that the member of staff reasonably suspects has been or is likely to be used to commit an offence, injury or damage to property. The member of staff carrying out the search should be the same sex as the pupil, and there must be a witness (also a staff member).
- A member of staff (authorised by the head) can carry out a search of a pupil of the opposite sex and/or without a witness present, if he/she reasonably believes there is a risk that serious harm will be caused to someone if the search is not conducted immediately.
- For items that are not covered under the above points, if the child does not give consent for a search, this will be dealt with as a refusal to follow an instruction in line with the behaviour policy and parents/carers may again be asked to search a child for an item.
- Staff are encouraged not to view images on children's computers, iPads and phones.
- Images will not be copied or printed.
- It may be necessary to look at an image or check a device to ascertain whether there is a safeguarding issue and facts regarding an allegation or when an image is directly

presented to a member of staff. Where an image is required to be viewed staff will record when they looked, where and why.

- Any sexual pictures of children under 13 will always be referred to the police and children's services. Children under 13 cannot legally consent to anything.
- Images cannot be deleted under the relevant data protection legislation by a member of staff. However, staff can ask the young person to delete images from any social media and sign and date that this has been done. If a child won't delete an image on request, this will result in an increased risk assessment of that child's safeguarding needs
- Without the child's consent, or where a child refuses to delete an image, the child's parent/carer may be called and requested to delete the images or take the device.
- If images are required for evidence the device may be confiscated (switched off and put in a sealed envelope) to be passed to the police. This can occur without the child's or parent/carer's consent if the content is considered harmful)
- Staff can also confiscate or remove any object/item considered harmful or detrimental to the school or children and adults in the school.
- Staff will not take images of a child's injury (e.g. following a disclosure of abuse) even if requested by children's social care, or make audio recordings of a child's disclosure.

6.6 Communicating with Children, Parents and Carers

- All children are made aware who they can speak to if they are worried about anything through assemblies, posters around school and in the classrooms, and class discussions. This includes parents and class teachers and any other trusted adult as well as designated staff for safeguarding or behaviour. We will explain the roles of parents and class teachers and any other trusted adult as well as the DSL and DMSs for safeguarding or behaviour.
- All staff will ensure children feel heard and understood by:
 - ensuring a culture of listening to children and taking account of their wishes and feelings,
 - understanding the difficulties that children may have in approaching staff about their circumstances, and
 - considering how to build trusted relationships which facilitate communication.
- All parents /carers are informed that our school has a Child Protection and Safeguarding policy and that we are required to follow Local Safeguarding Children Partnership and other statutory documents and government guidelines in respect of reporting suspected abuse to the Children's Social Services.
- Parents/carers are made aware of the responsibilities of staff members with regard to Child Protection procedures (e.g. information on the website or in letters to parents).
- Pupils and parents are made aware of how the school's safeguarding system works and with whom they can discuss any concerns.
- Our Child Protection and Safeguarding Policy, our Online Safety Policy and the name of our Designated Safeguarding Lead (DSL) and Designated Members of Staff (DMS) will be displayed on our website.
- Information about key aspects of safety will be discussed as part of personal, social and health education (PSHE), Relationships and Sex Education (RSE) and Health Education, or in assemblies where appropriate or necessary (e.g. NSPCC 'PANTS' 'Underwear Rule' - link in Appendix A).
- Information will also be made available about any local and national telephone help lines, e.g. in this policy or on the website (see Appendix A).
- In individual cases, parents are notified of the school's concerns at the earliest appropriate opportunity.

- In cases of a referral, where possible you should discuss the concerns and inform the parent that a referral will be made, ideally with their agreement. In cases where the parent does not agree the parent should still be informed that it will be shared unless to do so would place the child at increased risk of significant harm.
- NB: The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard, promote the welfare and protect the safety of children.

7. Early Intervention and Help

- All staff should be aware of their local Early Help process and understand their role in it.
- Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. When a child or family may be experiencing difficulties, support is most effective if it is provided as early as possible.
- Early Help involves identifying emerging problems; liaising with the Designated Safeguarding Lead or other relevant colleagues; sharing information with other professionals to support early identification and acting as lead professional in undertaking an Early Help Assessment (EHA)
- We will ensure Early Help Assessments are carried out in accordance with the guidance set out in Working Together to Safeguard Children 2018.
- If appropriate support is not available within a school's own resources, an Early Help Assessment will be completed to identify the child's needs and enable additional support to be sought from other agencies.
- If Early Help is appropriate, the Designated Safeguarding Lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional.
- Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.
- Practitioners should, in particular, be alert to the potential need for early help for a child who:
 - is disabled and has specific needs;
 - has special educational needs (whether or not they have a statutory Education Health and Care Plan);
 - is a young carer;
 - Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
 - Is involved in or at risk of serious violence;
 - is frequently missing/goes missing from care or from home;
 - is at risk of modern slavery, trafficking or exploitation;
 - is at risk of being radicalised or exploited;
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
 - is missing drugs or alcohol themselves;
 - has returned home to their family from care;
 - is a privately fostered child.

8. Staff training and awareness

8.1 DSL, DMS and Staff Training

- **All staff** will receive appropriate safeguarding and child protection training which is regularly updated, at least annually. In addition, all staff should receive safeguarding and child protection updates (for example, via email or staff meetings), as required, to provide them with relevant skills and knowledge to safeguard children effectively.
- Each school has a member of staff who has received appropriate training and support for the role of Designated Safeguarding Lead (DSL) in accordance with statutory requirements.
- We have additional trained members of staff, who will act in the absence of the Designated Safeguarding Lead, and have also received the appropriate training for the role of Designated Member of Staff (DMS).
- Training for the DSL and DMS should be updated at least every two years.
- Every member of staff, volunteer and governor knows the name of the DSL and DMSs and their roles and what the back-up arrangement are if the DSL is unavailable.
- We will ensure that all staff develop their understanding of signs and indicators of abuse and understand their responsibilities in passing concerns to the DSL or DMSs through training at induction and regular training at least annually by the DSL and at least every 3 years by a suitably qualified approved safeguarding trainer. All staff will also be given Safeguarding briefings and updates at least annually.
- All staff will be made aware of indicators which may signal that children are at risk from, or involved in, serious violent crime. They will be provided with training and information about the associated risks and the measures in place to manage these in line with the Home Office guidance "Preventing youth violence and gang involvement" and the Ofsted report "Safeguarding children and young people from knife crime" (see links in appendix A).
- We recognise that there is a variety of expertise within the staff team and will provide opportunities for staff to contribute to and shape Safeguarding arrangements and policy.

8.2 Staff Understanding of Statutory Guidance and Policies:

- All staff are familiar with the Child Protection and Safeguarding Policy. This document is included in the induction for each new staff member joining the Trust at any time.
- All staff are given a copy of Part 1 and Annexe A of 'Keeping Children Safe in Education' (latest version 2020) and a record is kept confirming that they have read and understood these. SLs will review any in-year updates to statutory guidance and ensure these are communicated to staff as required.
- Understanding of safeguarding and child protection is assessed and reviewed by regular inputs into staff training and briefings, quizzes, analysis of reports and referrals, questioning, role play and support discussion or supervision where available. Additionally who is making, for what and how referrals are made are also monitored and used to inform understanding of good practice and systems in place.
- All staff, volunteers, and supply staff are given a copy of the 'Code of Conduct' and a record is kept confirming that they have read and understood the document (see section 5 of this document).
- All staff are given guidance to help develop their understanding of the signs and indicators of abuse. Safeguarding guidance for trips, both local and residential, is provided in a separate Trips policy and shared with all staff and parent helpers accompanying school trips.

9. Curriculum Input

- We ensure that children are taught about safeguarding, including how to keep themselves safe online, through teaching and learning opportunities within a broad and balanced curriculum. This is differentiated according to the age and understanding of the pupil cohort, so that all pupils are enabled to access this input effectively.
- We will ensure that the curriculum includes input about safe relationships and personal resilience and is in line with Government regulations where relevant.
- This may include covering relevant issues through assemblies, ICT/computing, relationships education, relationships & sex education (RSE) and Health Education, personal, social & health education (PSHE).
- From September 2020, the mandatory Relationships and Sex Education (RSE) and Health Education curriculum will be followed. Additional information can be seen in the separate Trust RSE Policy.
- The Trust endeavours to provide a protective curriculum covering:
 - Healthy and respectful relationships
 - Respectful behaviour
 - Gender roles, stereotyping, equality
 - Body confidence and self-esteem
 - Prejudice
 - Rights and Responsibilities
 - Consent
 - Online Safety
 - Cultural and societal views of sexual harassment
 - That sexual violence and harassment is always wrong including child on child sexual abuse.

10. Children with special educational needs and disabilities

- We recognise that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges.
- These children may be especially vulnerable to abuse and we expect staff to take extra care to interpret possible signs of abuse or neglect.
- Staff should recognise that additional barriers can exist when recognising abuse and neglect in this group of children. These can include the potential for these children to:
 - be more prone to peer group isolation;
 - be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
 - have communication barriers and difficulties in overcoming these barriers.
- We will ensure assumptions are not made that indicators of abuse (such as behaviour, mood and injury) relate to the child's special educational needs or disability without further exploration.
- We will provide a school environment in which all pupils, including those with SEN/D, can feel confident and able to discuss their concerns.
- The DSL and DMSs will work together with the inclusion team, where necessary, to ensure that the needs of SEN/D pupils in relation to Child Protection issues, are responded to appropriately (e.g. for a child with particular communication needs).
- See also separate Policy for Special Educational Needs and guidance in Working Together to Safeguard Children (2018) regarding assessment of disabled children and their carers; young carers; children in secure youth establishments.
- **N.B. mental health conditions may also be barriers for reporting concerns.**

11. Mental health and behaviour

- We are aware of the advice issued by the Department for Education known as Mental Health and Behaviour in Schools Nov 2018 and the research report Mental Health and Wellbeing in Schools October 2018.
- We recognise that schools play an important role in helping our children to succeed by supporting their mental health and well-being to be resilient and mentally healthy.
- We will ensure that pupils and their families are enabled to participate as fully as possible in decisions and are provided with information and support. The views, wishes and feelings of the pupil and their parents/carers should always be considered.
- We recognise that some children are more at risk of developing mental health problems than others. These risks can relate to the child, their family or to community and life events.
- Risk factors are cumulative, and children exposed to multiple risks are more likely to develop behavioural or mental health problems.
- We recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation or has experienced trauma or adverse childhood experience (ACE). If staff have a mental health concern about a child, that is also a safeguarding concern, **immediate action should be taken**, following their child protection policy and speaking to the DSL or a DMS.
- Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

- Where severe problems occur, we expect the child will also be able to access support elsewhere as well, including from medical professionals working in specialist services e.g. CAMHS, voluntary organisations and local GPs.
- Each school will ensure that there is a **designated teacher** whose role is to promote the educational achievement of children exhibiting mental health difficulties and ensure that the needs of these children are responded to appropriately. Each school will also ensure that the designated teacher has received appropriate training.
- We recognise that there are things that schools can do – including for all their pupils, for those showing early signs of problems and for families exposed to several risk factors – to intervene early and strengthen resilience, before serious mental health problems occur.
- Schools can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools guidance.

12. Looked after children

- The most common reason for children becoming looked after is as a result of abuse and/or neglect.
- When dealing with looked after children **and** previously looked after children, our school will work together with all appropriate agencies and take prompt action when necessary to safeguard these children, as they are a particularly vulnerable group.
- We recognise that children in care may be especially vulnerable to abuse and expect staff to take extra care to interpret apparent signs of abuse or neglect.
- We will provide a school environment in which all pupils, including those who are looked after, can feel confident and able to discuss their concerns.
- The local governing body will ensure that staff are trained appropriately and have appropriate knowledge to protect and promote the welfare of looked after children. In particular, they will ensure that appropriate staff have:
 - the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order);
 - contact arrangements with birth parents or those with parental responsibility;
 - information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her;
 - details of the child's social worker; and
 - the name of the virtual school head in the authority that looks after the child.
- Each school will ensure that there is a **designated teacher** whose role is to promote the educational achievement of looked after children and ensure that the needs of looked after children are responded to appropriately. Each school will also ensure that the designated teacher has received appropriate training as defined in the Children and Young Person's Act 2008.
- Each school will work with the Virtual School Head from the Local Safeguarding Children Partnership responsible for the child regarding information about that child's provision and care, including attending the statutory Personal Education Plan (PEP) and Looked After Child meetings and how the Pupil Premium Plus funding can best be used to support the progress of looked after children in the school.

13. Confidentiality

- We recognise that matters related to Child Protection are of a confidential nature.
- Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means **only involving those who need to be involved**, such as the DSL/DMS and children's social care.
- **Staff cannot promise a child that they will keep certain information secret**, as this may ultimately not be in the best interests of the child.
- Information about a pupil should be shared with other staff on a need to know basis only.
- All staff must be aware that discussing children and specific cases outside of specific meetings in which they are required to be, or with people who are not directly involved in the case, is inappropriate and unethical.
- The Executive Headteacher will be informed of cases where necessary, and will be informed of all cases resulting in a referral to Children's Services.
- Written records will be kept of all concerns, whether or not there is a need to refer a matter immediately, and these records must be kept securely, separate from the main pupil file, in a locked location or on an appropriate secure computerised system (e.g. CPOMS).
- The schools will have clear retention policies regarding transferring safeguarding and child protection files. The [Information Sharing \(DfE, 2018\)](#) guidance says, 'In line with each organisation's own retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so'.
- The Data Protection Act 2018 and the GDPR make it clear that that **data protection should not get in the way of people sharing information for safeguarding purposes**. You do not need consent to share personal information for safeguarding purposes. Wherever possible, you should however be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. When you do need to gain consent to share information, it must be explicit and freely given. There may be some circumstances where it is not appropriate to seek consent because the individual cannot give consent, or it is not reasonable to obtain consent, or because to gain consent would put a child's or young person's safety at risk.
- See additional guidance in Working Together to Safeguard Children 2018 on information sharing, and the Q1E Data Protection policy.

14. Support for staff

- We recognise that staff who have been dealing with child protection issues may find the situation stressful or upsetting.
- We ensure that opportunities are provided for staff to be supported in these circumstances and to talk through any anxieties they may have.
- We will consider what arrangements can be made to provide supervision for DSL, DMSs and any other staff members as appropriate including staff working in Early Years and Foundation Stage.

15. Lone working

- Schools will undertake a needs assessment regarding consideration of workplace hazards and risks. The size of the school and other relevant factors will determine what equipment, facilities and personnel should be provided – including for example the number of first aiders, level of training, number and location of first aid kits. Points to consider include:
 - The physical size of the school, and the number of people at any one time that occupy the building(s), including staff, pupils, visitors, volunteers and contractors
 - The type of accidents identified in the past, and any hazards, such as chemicals or machinery
 - Whether any members of staff work remotely or alone
 - Whether there is enough provision of first-aiders to cover if some are absent.
- Staff working in isolation or late are encouraged to inform a colleague or move to a central/visual location.
- Staff working alone with children will also cover the guidance in the code of conduct which states, staff should always “work in an open environment. Avoid private or out of sight locations, encourage open communication and where appropriate keep doors open”.
- Neutral Notification forms will be completed in any situation which may cause concern or risk (see section 16)

16. Neutral notification

There may be occasions where something occurs which causes a member of staff to have doubts about the behaviour of another adult towards a pupil or another child; or about something that they themselves have done that may be misconstrued or misinterpreted. It is important that any concerns, or incidents which might give rise to concerns about the conduct of staff, are reported to the DSL or Headteacher, however minor. In the vast majority of cases, there will be an innocent explanation for what has occurred, and staff should not feel that making a report, or being the subject of a report, will cause them to suffer any detriment or stigma where this is the case.

Reporting of these types of concerns is a neutral act, and the Headteacher and DSL will, on receipt of a report, determine how to best approach the issue.

The process for reporting a concern of this nature about safeguarding is called 'Neutral Notification'. This is a procedure for self-reporting or reporting about the behaviour and action of others. Neutral Notification must be used by staff to record all events and/or situations which have the potential to be misconstrued or misinterpreted by others; or where they are at all concerned about the behaviour of an adult, not just where it is clear that a role or professional boundary has been broken. The purpose of neutral reporting is to protect both pupils and the staff working with them and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.

The circumstances in which staff must make a Neutral Notification are as follows:

- any incident where s/he feels that his/her actions or behaviour towards a pupil may have been misinterpreted or may have given rise to a risk of misinterpretation;
- any incident where s/he feels that another adult's actions or behaviour towards a pupil may have been misinterpreted or may have given rise to a risk of misinterpretation;
- any use by an adult of sexually inappropriate language, references or jokes to a pupil;

- email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;
- any unsupervised access to a pupil other than in the context of a planned one-to-one lesson (this would include all one-to-one meetings or discussions, whether related to school work, pastoral issues or other matters);
- any incident of physical contact with a pupil when no one else is present that may be deemed to be inappropriate, such as when administering first aid or medical treatment, intimate care, and including physical demonstrations in one-to-one sports coaching, music lessons etc;
- any incident where a member of staff has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- if a pupil becomes aware of a staff member's home address, mobile or home phone number, or non-school e-mail address;
- if a staff member becomes involved in a close or sexual relationship with a former pupil, regardless of the age of the pupil;
- the fact of, and explanation for, unsupervised access to a pupil on schools trips;
- any incident where, for whatever reason, a member of staff has not complied with this Code of Conduct.

NB: This is not intended to be an exhaustive list. Anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with pupils must be notified, in order to protect both pupils and the members of staff involved.

The Neutral Notification system is intended to enable staff to self-report, as well as to make notifications about other staff members. It is accepted that there are occasions when school staff, as professionals, have to make decisions to act in a particular way in order to protect the health, safety and welfare of their pupils. This may, in some cases, put the adult in a vulnerable position and cause the adult, with hindsight, to consider that on reflection they might not act in the same way in a similar situation. In this scenario, staff must make a Neutral Notification.

Neutral Notifications may be made in person or on the Neutral Notification Form (see Appendix G) to the Headteacher/DSL. If the notification is made in person in the first instance, staff may be required to complete a Neutral Notification Form later. The Headteacher/DSL will record all Neutral Notifications centrally as part of a single record, and obtain the advice of the local authority as necessary.

A staff member who makes a Neutral Notification, or a more serious allegation, in good faith will suffer no detriment as a result, and will benefit from the protection set out in the Whistleblowing Policy. Failure to make a Neutral Notification may, however, constitute misconduct and require the implementation of the Disciplinary Procedure.

NB: in line with the Disqualification under the Childcare Act 2006 [Regulations August 2018] and Trust Code of Conduct all staff must inform the headteacher of any caution, conviction or criminal charges brought during their employment, or if they are subject to any police investigation, and inform the headteacher or DSL where their relationship(s) and/or associations both within and outside of the workplace (including online) may have implications for the safeguarding of children in our schools.

17. Specific safeguarding issues

Up-to-date guidance and practical support on specific Safeguarding issues will be sought where necessary. The DSL will attend relevant training and ensure that staff are aware of issues such as Child Sexual Exploitation, Child Criminal Exploitation, Peer on Peer Sexual Abuse, non-consensual sharing of nudes and semi nudes images and/or videos, Female Genital Mutilation, Fabricated and Induced Illness, Domestic Abuse, so-called Honour-Based Abuse, Gangs, serious violent crimes, Mental Health, Online Safety and other relevant training, so that staff understand the indicators and recognise the complexities of these issues for young people and measures to manage these. Some of these specific issues are covered below. The contextual safeguarding risks of each school will be taken into consideration and specific, appropriate training attended.

17.1 Radicalisation, extremism and terrorism

Definition: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions. Extremism is defined as the holding of extreme political or religious views which may deny rights to any group or individual. 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 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.

All schools must have due regard to the need to prevent pupils from being drawn into terrorism or being radicalised. This should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse.

Our school works within the curriculum to promote British values, including tolerance and respect for diverse views, while challenging prejudice of any kind. We are an inclusive school which values citizenship and a sense of belonging. Pupils are encouraged to share their views and recognise that they are entitled to have different beliefs, but that these should not be used to influence others.

We support the **PREVENT Strategy**, which works to prevent the growth of issues that create a climate which encourages radicalisation and extremism, which in turn can lead to acts of violence or terrorism. All staff have attended or been provided with online PREVENT training through the **Channel** Programme (which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism). Training aims to enable staff to assess the risk of children being drawn into extremist ideas that are part of terrorist ideology and to identify any child who may be at risk and how to support them.

We will ensure that children are safe from terrorist and extremist material when accessing the internet in school.

As with all matters pertaining to the maintenance of a Safeguarding culture, staff are expected to be vigilant in identifying concerns. If any concerns arise, or are disclosed by a child, they will be responded to following normal safeguarding processes, and advice would be sought from colleagues in the Local Authority (either PREVENT co-ordinator or safeguarding services) if

necessary. Concerns will be discussed with the child's parents whenever possible. Referrals will be made to the Channel programme when appropriate (see appendix A for PREVENT referral contacts). See the front page of this policy for the specific school's PREVENT point of contact.

17.2 Domestic Abuse

Definition: Domestic Abuse is “any incident or pattern of incidents of controlling, coercive threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to; psychological; physical; sexual; financial and emotional.”

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

It is important to recognise that some children will be living (or may have lived) in families where Domestic Abuse occurs. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children, as well as placing them at risk of physical harm.

Operation Encompass

Operation Encompass operates in the majority of police forces across England. The areas where our schools are located - Wandsworth and Bromley - are both part of it (in Wandsworth it is also known as Project Tearose). It is an information sharing agreement which helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there is a child in the household who has experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before the child arrives at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

National Domestic Abuse Helpline

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

17.3 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity. CCE can include children being coerced into moving drugs or money across the country (see section on county lines), forced to shoplift or pickpocket, or to threaten/commit serious violence to other young people. The victim may have been criminally exploited even if the activity appears consensual.

Children can become trapped by this type of exploitation. Perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may

still have been criminally exploited, even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE) occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity.

CSE can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Victims can be exploited even when activity appears consensual. The abuse:

- can be perpetrated by individuals or groups, males or females, and children or adults;
- can be a one-off occurrence or a series of incidents over time;
- can range from opportunistic to complex organised abuse;
- can involve force and/or enticement-based methods of compliance;
- may, or may not, be accompanied by violence or threats of violence;
- can take place online.

It is a crime for an adult in a position of trust to engage in sexual activity with a person under 18.

17.4 Children who harm other children, including child on child sexual violence and sexual harassment (Peer on Peer abuse)

We recognise that children are capable of abusing their peers. Our school works to minimise the risk of peer-on-peer abuse and will investigate and deal with any allegations robustly.

In line with Keeping Children Safe in Education 2021 and guidance following "Everyone's Invited" 2021, we recognise the gendered nature of peer on peer abuse, but all child-on-child abuse is unacceptable and will be taken seriously. We believe that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

Measures in place to minimise or prevent child-on-child abuse

Section 9, Curriculum Input, outlines where teaching is aimed at addressing child-on-child abuse.

This includes teaching and learning opportunities including PSHCE and RSE covering staying safe online, safe relationships and personal resilience, respectful behaviour, gender roles, stereotyping, equality, body confidence and self-esteem, prejudice, rights and responsibilities, consent, cultural and societal views of sexual harassment and that sexual violence and harassment is always wrong.

The decision as to whether or not behaviour directed at another child should be categorised as harmful is clearly dependent on the individual circumstances of the case. It may be helpful to consider the following factors:

- The relative chronological and developmental age of the two children;
- Whether the alleged abuser is supported or joined by other children;
- Any differential in power or authority (e.g. related to race, gender, physical, emotional or intellectual vulnerability of victim);
- The actual behaviour (consider all factors);
- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation;
- The degree of coercion, physical aggression, intimidation or bribery;
- The victim's experience of the behaviour and the impact it is having on them;
- Attempts to ensure secrecy; and
- Duration and frequency of behaviour.

Advice can be found in the Harmful Sexual Behaviour(HSB) Framework (NSPCC)

Different gender issues can be prevalent.

Risk assessments will be carried out where needed out and strategies put in place to protect the child who has suffered abuse and to offer them support. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion. Allegations are treated with confidentiality and sensitivity and without judgement until processes and investigations have been completed.

- In this event of a pupil making an allegation about another pupil, the designated staff should
- be informed.
- Both children's views will be taken into account.

- Safeguarding referral procedures will be followed accordingly as in all other cases.
- All children and families will be offered support and the school will work with all agencies to ensure the care and safety of all children.
- Safeguarding concerns about child on child abuse and all reports should be made to the DSL
- or DMS immediately and investigated. These should be considered as safeguarding concerns
- for both parties involved.

It is important to be conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. Abusive behaviour can be displayed in a variety of ways and can consist of sexual abuse; physical harm; emotional abuse and/or verbal abuse. There is significant research evidence to suggest that children who behave in a sexually inappropriate and / or aggressive way towards other children are often victims of abuse themselves. There is also significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This must be considered throughout the planning stages of managing cases of abuse perpetrated by children.

Peer on Peer abuse can take different forms, such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault;(this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.

Where an allegation is made regarding alleged abuse perpetrated by another child, the age and understanding of the alleged perpetrator must be considered throughout decision making.

The circumstances of the alleged perpetrator must be assessed separately from those of the alleged victim and must include exploration of why this behaviour has occurred.

The focus of involvement with the alleged perpetrator and their family will be both to determine risks to and from the child concerned within the parameters of the Children Act 1989, and to manage allegations against them within the criminal justice framework.

Process

When reports of sexual violence or sexual harassment are made, or an instance of child on child abuse comes to light, is disclosed, or where there is evidence to indicate it has occurred, the school will act in accordance with Part 5 of Keeping Children Safe in Education (2021). A referral should be made to children's social care in respect of both children concerned. The interests of the identified victim must always be the paramount consideration.

Staff will:

- **Reassure all** 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- **Never** promise confidentiality.
- **Listen carefully and non-judgementally**, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc
- **Only record the facts as the child presents them.** The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;
- Where the report includes an online element, follow searching, screening and confiscation advice for schools and UKCCIS sexting advice for schools. The key consideration is for staff not to view or forward illegal images of a child.

Where the allegation relates to an incident that took place within a school, or relates to pupils attending the same school the school should:

- Keep the involved children separate during the school day while the investigation is taking place to avoid collusion or intimidation;
- Having established what is alleged to have taken place, avoid talking to the children any further about the incident(s);
- Keep a detailed log of actions, discussions and decisions;
- Carry out an immediate risk assessment and put a risk management plan in place if necessary – ensure that non-teaching times are considered, especially times when pupils are moving around the school as the child who has been harmed may feel very vulnerable at such times;
- The risk and needs assessment should consider:
 - the victim, especially their protection and support;
 - the alleged perpetrator; and
 - all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them.
- Be aware that whether the incident(s) happened in school or elsewhere, other pupils may know what has happened (or is alleged to have happened). Other pupils may have been involved, either directly or indirectly. Other pupils may be judgemental or make unkind, or even threatening, comments;

- Contact parents where possible (unless advised otherwise, or serious concern re further risk to child or in particularly complex situations e.g. sexual exploitation – in these instances seek advice); and
- Consider whether the situation warrants information being shared with other parents in the school (e.g. where press coverage is likely) and seek advice.

The needs of each child should be separately considered by social care. In cases where a significant incident has occurred or the alleged incident is of a serious nature, the usual process will involve a separate strategy meeting in respect of each child, and section 47 enquiries initiated, which will involve discussion with police (CAIT). Different social workers should be allocated for the child who is the victim and the child who has harmed, even if they are living in the same household. Police will decide whether an alleged offence should be subject to criminal investigation.

If the investigation / assessment concludes that the allegations are substantiated, the children should not necessarily be expected to continue their education in contact with each other. The child/children responsible for the abuse should be moved if necessary. The views and wishes of the child who has been abused and their parents should be appropriately considered in the decision making.

Once initial actions have been taken and processes are in place, consideration should be given to ongoing support/counselling for the children involved, where appropriate/necessary. In cases of unsubstantiated, unfounded, false or malicious reports the root causes of the allegations need to be considered using a trauma informed approach, which could be considered a safeguarding need in themselves, and not necessarily requiring disciplinary action. Support and discipline does not need to be mutually exclusive, so may need both.

What to consider

Schools should carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children (e.g. is the alleged perpetrator significantly older, more mature, more confident? Does the victim have a disability/learning difficulty?);
- if the alleged incident is a one-off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children or school staff; and
- other related issues and wider context.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child.

Additional guidance can be found in *Sexual violence and sexual harassment between children in schools and colleges* (DfE, 2021) and the *London Child Protection procedures and Part 5 and Annex B of Keeping Children Safe in Education* (2021). See Appendix A.

17.5 Sexual Violence and Sexual Harassment

Definition of sexual violence

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

Definition of consent

Consent is about having the freedom and capacity to choose. Examples of consent with regards to sexual activity can be found in KCSIE 2021, page 137. No child under the age of 13 can consent to any sexual activity and the official age of consent is 16.

Definition of sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting; physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element and.
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of nudes and semi nudes images and or videos
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats.

Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face to face and can also occur simultaneously between the two. When considering HSB, ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential, specialist support and advice on HSB is available from the specialist sexual violence sector including the NSCPP Harmful Sexual Behaviour Framework see appendix A.

17.6 Children Missing from Home or Care

Children who go missing from home or care are particularly vulnerable and may be at significant risk. The immediate risks associated with going missing include increased vulnerability, missing out on schooling and education, involvement in criminal activities, becoming a victim of abuse, becoming a victim of crime (for example through sexual assault and exploitation), alcohol/substance misuse, and deterioration of physical and mental health. These children may have no means of support or legitimate income, leading to high risk activities. Longer-term risks include disengagement from education, crime, long-term drug/alcohol dependency, homelessness, child sexual exploitation and poor physical or mental health.

17.7 Children Missing from Education

All children, regardless of their circumstances, are entitled to a full-time education that is suitable to their age, ability and aptitude and any special educational needs they may have.

A child going missing from school, or not attending school regularly, is a potential indication of abuse or neglect.

We will ensure staff are alert to the potential risks of poor or non-attendance or cessation of attendance, including the signs to look out for and triggers to be aware of when considering the risks of potential concerns such as travelling to war zones, FGM and forced marriage.

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

The school will report concerns that a child is 'missing' to the appropriate education welfare officer and children's social care team following attempts to contact the family where no contact is made after 5 days. All children will have a minimum of two contact numbers provided by parents/carers on admission.

Parents/carers of children who are going to leave school other than at the expected times (end Nursery/Y6) will be required to notify the school and give the name of the new school. If this is not

supplied the school may refer this to Educational Welfare Officer or Local Safeguarding Children Partnership and any other services as appropriate.

Our school has both an admissions register and an attendance register, and all pupils are placed on both registers. Pupils must be entered on the admissions register at the beginning of the first day on which the school has agreed or been notified that the pupil will attend the school. If the pupil fails to attend the school will undertake reasonable enquiries to establish their whereabouts.

The school will make reasonable enquiries (jointly with the Local Authority) to establish the whereabouts of a pupil who ceases to attend, before deleting the child from roll if the deletion is under regulation 8(1), sub paragraphs (f)(iii) and (h)(iii) (see table below).

The school will always inform the LA of any pupil who is going to be removed from the admission register under any of the grounds listed in the regulations (see table overleaf). The notification will include:

- a) The full name of the pupil;
- b) The full name and address of any parent with whom the child usually resides;
- c) At least one telephone number of the parent;
- d) The pupil's future address and destination school (if applicable); and
- e) The ground in regulation 8 under which the pupil's name is to be removed.

The notification should be made as soon as the grounds above are met and prior to removal. This is essential so that the Local Authority can take appropriate follow up action when required.

The school will also notify the Local Authority within 5 days of adding a pupil's name to the admission register at a non-standard transition point. The notification will include all the details included in the admissions register. The school will also provide information about pupil admissions at standard transition points if requested to do so by the Local Authority.

In line with the safeguarding duties of the school, all unexplained pupil absences will be investigated. The school is required to, and will, inform the Local Authority of any pupil who fails to attend school, or has been absent without permission for a continuous period of 10 school days or more. However, the school will follow the procedures set out below in respect of absence of less than 10 days.

Established procedures will be followed, but each case needs to be treated on its own merits, taking into account all the facts of the case. Some children are at particular risk, and may also need referral to social care.

Where the school is otherwise unable to make contact with an absent child's parent or carer, or receives an explanation as to the child's absence which may be a cause for concern, the school will seek guidance after 11am on the second consecutive day of the child's absence.

For a child considered to be vulnerable, for whatever reason, or a child who is known to travel to school unaccompanied in the morning, the school should make contact with the children's social care team after 11am on the day of absence.

Grounds for deleting a pupil of compulsory school age from the school admission register set out in the Education (Pupil Registration) (England) Regulations 2006, as amended

1	8(1)(a) - where the pupil is registered at the school in accordance with the requirements of a school attendance order, that another school is substituted by the LA for that named in the order or the order is revoked by the LA on the ground that arrangements have been made for the child to receive efficient full-time education suitable to his age, ability and aptitude otherwise than at school.
2	8(1)(b) - except where it has been agreed by the proprietor that the pupil should be registered at more than one school, in a case not falling within sub-paragraph (a) or regulation 9, that he has been registered as a pupil at another school.
3	8(1)(c) - where a pupil is registered at more than one school, and in a case not falling within sub-paragraph (j) or (m) or regulation 9, that he has ceased to attend the school and the proprietor of any other school at which he is registered has given consent to the deletion.
4	8(1)(d) - in a case not falling within sub-paragraph (a) of this paragraph, that he has ceased to attend the school and the proprietor has received written notification from the parent that the pupil is receiving education otherwise than at school.
5	8(1)(e) - except in the case of a boarder, that he has ceased to attend the school and no longer ordinarily resides at a place which is a reasonable distance from the school at which he is registered.
6	8(1)(f) - in the case of a pupil granted leave of absence in accordance with regulation 7(1A), that — (i) the pupil has failed to attend the school within the ten school days immediately following the expiry of the period for which such leave was granted; (ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend the school by reason of sickness or any unavoidable cause; and (iii) the proprietor and the LA have failed, after jointly making reasonable enquiries, to ascertain where the pupil is.
7	8(1)(g) - that he is certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he nor his parent has indicated to the school the intention to continue to attend the school after ceasing to be of compulsory school age.
8	8(1)(h) - that he has been continuously absent from the school for a period of not less than twenty school days and (i) at no time was his absence during that period authorised by the proprietor in accordance with regulation 6(2); (ii) the proprietor does not have reasonable grounds to believe that the pupil is unable to attend the school by reason of sickness or any unavoidable cause; and (iii) the proprietor of the school and the LA have failed, after jointly making reasonable enquiries, to ascertain where the pupil is.
9	8(1)(i) - that he is detained in pursuance of a final order made by a court or of an order of recall made by a court or the Secretary of State, that order being for a period of not less than four months, and the proprietor does not have reasonable grounds to believe that the pupil will return to the school at the end of that period.
10	8(1)(j) - that the pupil has died
11	8(1)(k) - that the pupil will cease to be of compulsory school age before the school next meets and (i) the relevant person has indicated that the pupil will cease to attend the school; or (ii) the pupil does not meet the academic entry requirements for admission to the school's sixth form
12	8(1)(l) - in the case of a pupil at a school other than a maintained school, an Academy, a city technology college or a city college for the technology or the arts, that he has ceased to be a pupil of the school
13	8(1)(m) - that he has been permanently excluded from the school

14	8(1)(n) - where the pupil has been admitted to the school to receive nursery education, that he has not on completing such education transferred to a reception, or higher, class at the school
15	8(1)(o) where— (i) the pupil is a boarder at a maintained school or an Academy; (ii) charges for board and lodging are payable by the parent of the pupil; and (iii) those charges remain unpaid by the pupil's parent at the end of the school term to which they relate

In cases of Elective Home Education, where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will work together with the LA and other key professionals to coordinate a meeting with parents/carers 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.

17.8 Child abduction and community safety incidents

Definition: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

17.9 Children and the court system

Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

17.10 Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides

information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

17.11 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation

17.12 County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

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

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (National Crime Agency: Modern Slavery and Human Trafficking) should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

17.13 HBA (So called Honour Based Abuse)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. HBA includes:

- **Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35-36 of which focus on the role of schools. School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.
- **Female genital mutilation (FGM):** FGM includes all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. Professionals in all agencies, and individuals and groups in relevant

communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM. On their own, each indicator may not indicate a risk but if there are two or more indicators present this could signal that there is a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Girls at risk of FGM may not yet be aware of the practice or that it may be practised on them, so sensitivity should always be shown when approaching the subject.

Any staff member should speak to the designated safeguarding lead (or deputy) with regard to any concerns about FGM.

In addition, there is **a specific legal duty on teachers to report directly to the police, if they believe FGM has been carried out**. This duty was introduced in 2015.

Summary: Mandatory reporting of FGM*

Duty applies to regulated health and social care professionals and teachers in England and Wales.

Requires these professionals to make a report to the police if, in the course of their professional duties, they:

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

*introduced in Section 5B of the FGM Act 2003, as inserted by section 74 of the Serious Crime Act 2015

The above summary is taken from the Home Office FGM mandatory reporting factsheet which can be found at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

18. Contextual Safeguarding

All staff understand that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school or within.

Additionally, as well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school, from within peer groups, or more widely from within the wider community and/or online.

All staff, but especially the DSL (and DMs) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence, including by gangs, organised crime groups such as county lines, trafficking, online abuse and the influences of extremism leading to radicalisation.

Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials. Any potential harmful effects to individuals identified as vulnerable to extremist ideologies or being drawn into terrorism should also be considered.

All staff, but especially the designated safeguarding lead (DSL) or deputy lead, understand these extra familial issues and will ensure that the context within which such incidents and/or behaviours occur is considered. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors and influences are present in a child's life that are a threat or pose a risk to their safety or welfare.

The school will contribute to assessments and mapping processes, taking those extra familial risks into account and sharing relevant information with social workers and other professionals in order to enable all such factors to be taken into account when risk to children is being assessed. This will allow any assessment to consider all the available evidence and the full context of any abuse. Children who may be alleged perpetrators should also be assessed to understand the impact of contextual issues on their safety and welfare.

Interventions should focus on addressing these wider environmental factors, which are likely to be a threat to the safety and welfare of a number of different children who may or may not be known to local authority children's social care. Assessments of children in such cases should consider the individual needs and vulnerabilities of each child. They should look at the parental capacity to support the child, including helping the parents and carers to understand any risks and support them to keep children safe and assess potential risk to child. Children's social care assessments should consider where children are being harmed in contexts outside the home so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

19. Positive Handling and physical intervention

- Our policy on physical intervention by staff is set out in a separate document.
- Staff should only use physical intervention in particular circumstances, at a last resort, and that even when necessary the minimum “reasonable” force should be used to prevent harm to the child or another child or adult.
- Positive Handling training is provided for staff by an accredited trainer, to ensure best practice at all times.
- Risk assessments will be carried out where individual pupils have additional needs or challenges that mean there is an increased likelihood of physical interventions being required and individual plans will be developed and shared/agreed with the parents/carers.
- Physical intervention which causes injury or severe distress to a child may have to be considered under Child Protection or disciplinary procedures.

20. Safer recruitment

The school will ensure that it strictly follows 'safer recruitment' procedures to ensure that all staff, and volunteers working in regulated activity, will be subject to the required identity and qualification checks, and references, including authentication checks. The trust's Recruitment policy and Disclosure and Barring Service (DBS) policy provide further details. The school will follow the most recent guidance in respect of this issue including Part 3 of KCSIE 2021.

All staff in senior positions, local governors and trustees will be subject to additional Section 128 checks. (N.B. Associate members don't need to have an enhanced DBS check).

In the 'Disqualification Under the Childcare Act 2006' (DfE 2018) there is a clear expectation that staff will discuss with managers any relationship/association (in or out of school or online) that may have implications for the safeguarding of children in school. These discussions can help schools:

- safeguard their employees' welfare and contribute to their duty of care towards staff;
- identify whether arrangements are needed to support these staff;
- manage children's safety providing them with information that will help them consider whether there are measures that need to be put in place to safeguard children.

From 01 January 2021 the Teacher Regulation Agency (TRA) teacher Services system will no longer maintain a list of those teachers who have been sanctioned in EEA member states. Advice about how information about a teacher's past conduct may be obtained can be found at paragraph 172 of Keeping Children Safe in Education 2021.

Nevertheless, schools must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include:

- criminal records checks for overseas applicants – Home Office guidance can be found on GOV.UK; and for teaching positions
- obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked.

Advice about which regulatory or professional bod applicants should contact is available from the National Recognition Information Centre for the United Kingdom, UK NARIC. Further information can be found in DfE Guidance: Recruit teachers from overseas and Staffing and Employment: Advice for Schools January 2021.

21. Visitors and volunteers

Volunteers are welcome at our school. All visitors are required to sign in and identify themselves when on site.

Any person who volunteers with pupils in regulated activity will be subject to all reasonable vetting procedures and the required Disclosure and Barring Service checks. Such checks will apply to local governors and trustees. The school's **Disclosure and Barring Service (DBS) policy** provide further details.

A volunteer risk assessment will be completed in advance to ensure all necessary training or measures are in place. See appendix I for an example.

All volunteers will be given the **Code of Conduct** and informed of their safeguarding responsibilities. Regular volunteers are required to read and certify that they have read Part 1 of Keeping Children Safe in Education.

22. Allegations against staff, supply staff, volunteers or other adults

There may be occasions when a pupil, a parent or another person makes an allegation against a member of staff, supply teacher, volunteer or other adult.

Each local authority appoints a **Local Authority Designated Officer (LADO)** who is responsible for managing all child protection allegations made against staff and volunteers who work with children in their area.

Contact details for the school's LADO are on the front of this policy, together with a link to the LADO referral form.

The LADO must be consulted within 24 hours if there are concerns that a worker (member of staff, supply teacher or volunteer) has:

- Behaved in a way that has, or may have, harmed a child;
- Possibly committed a criminal offence in relation to a child; or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (Transferable Risk).

Transferable Risk relates to where a member of staff, supply teacher or volunteer is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children.

Safeguarding concerns about a staff member, volunteer or supply teacher should be referred to the DSL and the Headteacher. The DSL/Headteacher will make a referral to the LADO.

Concerns about a Headteacher should be referred to the Chair of the Local Governing Body (LGB) or direct to the LADO.

Concerns about the Executive Headteacher should be referred to the Chair of Trustees or direct to the LADO.

Concerns about Early Years staff will be referred to the LADO and OFSTED.

The school will also refer a member of staff or other adult to the Disclosure and Barring Service when required.

Where the school identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately as per the processes explained in this policy and Parts 1 and 4 of KCSIE 2021 and Working Together to Safeguard Children 2018.

There are two aspects to consider when an allegation is made:

1. Looking after the welfare of the child - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in part one of this guidance.
2. Investigating and supporting the person subject to the allegation – the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, schools should:

- apply common sense and judgement;
- deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

Allegations that meet the harms threshold:

If the allegation is substantiated and:

- the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
- the employer ceases to use the person's services.

The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

In the case of a member of teaching staff at a school, the case manager **must** consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Allegations that do not meet the harms threshold:

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

'Low-level' concerns could include, but are not limited to:

- being over 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.

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported as per other safeguarding concerns about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, to the head teacher or principal.

If a staff member has a concern about the school they wish to report, they should follow the process set out in the **Q1E Whistleblowing Policy**. Whistleblowing is the act of telling the authorities or the public that the organisation you work for is doing something immoral or illegal, and which is in the public interest.

If a staff member feels unable to raise an issue via the Whistleblowing Policy, or feels that their genuine concerns are not being addressed, they can also contact the NSPCC whistleblowing helpline on 0800 028 0285 or at help@nspcc.org.uk.

All staff are expected to recognise the need for confidentiality in these situations

NB/ All staff have a contractual obligation to inform the HT or HR of any caution, conviction or criminal charges brought during their employment, or if they are subject to any police investigation. In addition, we have a clear expectation that staff will inform the HT or DSL where their relationship(s) and/or associations both within and outside of the workplace (including online) may have implications for the safeguarding of children in our school (Disqualification under the Childcare Act 2006 [Regulations August 2018]).

Supply Teachers

KCSIE 2020 (paragraphs 213 – 217) refers and sets out in specific detail the particular risks that may arise when employing supply teachers. Headteachers, DSLs and those involved in recruiting and managing supply teachers should make themselves familiar with this guidance.

23. Local Governor and Trustee responsibilities

23.1 Trustees

All trustees will:

- Appoint a safeguarding lead trustee (it is important to remember that **safeguarding is the responsibility of all trustees**. The lead trustee must not be the only person among the trustees who understands safeguarding).
- Ensure Q1E has up to date, compliant, effective policies in place, reviewed annually, for:
 - Child protection and safeguarding
 - Online safety
 - Managing allegations against staff, supply teachers, volunteers and other adults.
- Remedy any deficiencies or weaknesses in regard to child protection arrangements that are brought to their attention without delay;
- Ensure there is a named lead member of staff for safeguarding at trust level.
- Ensure that a Trustee has been nominated to liaise with the local authority and/or partner agencies on issues of child protection in the event of an allegation being made against the Executive Headteacher or another member of the Trust's central team.

In addition to their wider responsibilities as a trustee, the safeguarding lead trustee will:

- Champion safeguarding throughout the trust.
- Ensure the board is kept up to date on changes to statutory guidance.
- Make sure there are regular reviews of safeguarding policies and procedures.
- Inform the board whether it needs to make any changes (e.g. in light of new regulations).
- Ensure there is regular space on the board agenda to discuss/review safeguarding.
- Help trustees understand and challenge any trust-level safeguarding policies or reports.
- Consider the trust's strategic plans and make sure they reflect safeguarding legislation.
- Review whether the things the trust has put in place are creating a safer culture and keeping children safe.
- Check the trust's risk register properly reflects safeguarding risks and measures.
- Oversee any safeguarding allegations against headteachers, together with the executive head and the safeguarding lead for the trust.

In addition to their trustee responsibilities, the chair of the trust board will:

- Work with the executive headteacher and LADO to confirm the facts about any individual allegations against a headteacher in the trust, and to reach a joint decision on the way forward in each case. In cases that involve the executive headteacher, the chair is the key person to deal with the allegation.

23.2 Local Governing Bodies (LGBs)

Responsibilities of all local governing bodies:

- Appoint a named safeguarding link local governor.
- Ensure the relevant sections of KCSiE are read, understood, and able to be actioned by all staff and local governors annually.
- Ensure safeguarding training is attended by all school staff and local governors (at induction, and regularly thereafter).
- Ensure that the Q1E Child Protection and Safeguarding Policy is made available to and read by all school staff and local governors.

- Ensure that the school develops a school-specific annexe document for the Q1E Child Protection and Safeguarding Policy, if applicable, which sets out any ways in which the school has adapted the Q1E policy in order to meet the context and needs of their setting (this annexe must be approved by the trust board).
- Ensure that all local policies, procedures and training in their school are effective, legally compliant and take into account the procedures and practice of the Local Safeguarding Children Partnership.
- Ensure the school has appointed a Designated Safeguarding Lead (DSL) and that named individuals are fulfilling all the other roles listed in the table on the front page of this policy.
- Ensure that a member of the LGB (usually the Chair) has been nominated to liaise with the local authority and/or partner agencies on issues of Child Protection and in the event of an allegation being made against the Headteacher.
- Ensure the DSL is given "the time, funding, training, resources and support" to carry out their role in accordance with Annexe B of Keeping Children Safe in Education.
- Ensure staff and other adults receive regular supervision and support if they are working directly and regularly with children and learners whose safety and welfare are at risk.
- Ensure the school curriculum covers safeguarding, including online safety.
- Ensure the school records attendance, follows up absence and responds effectively to children who go missing from education.
- Ensure the school site is a safe place, including managing the perimeter and access to buildings, and ensuring visitors can be readily identified.
- Ensure Safer Recruitment procedures are followed, with effective checking and vetting - see Q1E Recruitment policy and Q1E Disclosure and Barring Service (DBS) policy.
- Ensure a single central record (SCR) is kept of checks carried out on staff and volunteers.
- Ensure a referral is made to the DBS if someone has harmed, or poses a risk of harm to a child and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.
- Ensure the school has an effective online monitoring system and online filters in place.
- Ensure that any deficiencies or weaknesses in regard to Child Protection arrangements that are brought to their attention are referred to the trust board's attention without delay.

In addition to the LGB responsibilities, the safeguarding link local governor should:

- Regularly attend safeguarding training to stay up to date with latest statutory guidance.
- Review safeguarding reports written by the headteacher or DSL.
- Make sure there is space on the LGB agenda to discuss safeguarding reports.
- Meet the DSL regularly to discuss the DSL role, their capacity and the support they receive.
- Carry out regular safeguarding monitoring visits and update the LGB on these.
- Make sure that checks for the single central record are happening.
- Ensure the LGB is kept updated on anything issued locally by school safeguarding partners.
- Be made aware of safeguarding incidents by senior leaders (without details – see below).
- Oversee safeguarding allegations against staff/supply staff/ volunteers/ other adults, together with the head and DSL.

In addition to the LGB responsibilities, the LGB Chair should:

- Work with the headteacher and LADO to confirm the facts about individual allegations against staff, supply staff, volunteers or other adults, and to reach a joint decision on the way forward in each case. In cases that involve the headteacher, the Chair is the key person to deal with the allegation.

24. Designated Safeguarding Lead (DSL) responsibilities

Local Governing Bodies should ensure that the school designates an appropriate senior member of staff to take lead responsibility for safeguarding and child protection, including online safety. The DSL role is detailed in Keeping Children Safe in Education Annex B.

Remember that safeguarding is everyone's responsibility, not solely that of the DSL or DMS.

The broad areas of responsibility for the Designated Safeguarding Lead are:

- Managing referrals;
- Referring all cases of suspected abuse to the Local Authority children's social care
- Referring all cases which concern a staff member to the Local Authority Designated Officer (LADO) and the Disclosure and Barring Service (where the person has been dismissed or left due to risk/harm to a child or police where a crime has been committed);
- Liaise with the headteacher to inform him/her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- Committing resources and, where appropriate, supporting and directing other staff;
- Act as a source of support, advice and expertise to staff on matters of safeguarding and safety when deciding whether to make a referral by liaising with relevant agencies;
- Take 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;
- Have a working knowledge of the assessment process for providing Early Help and how local authorities conduct a child protection case conference and review and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff (including new and part time staff) has access to and understands the trust's child protection policy and procedures;
- Be alert to the specific needs of children in need, those with SEND and young carers;
- Help promote educational outcomes by sharing information with teachers and school leadership staff about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced;
- Be able to keep detailed, accurate, secure written records of concerns and referrals;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them;
- Raise awareness of the trust's policy and safeguarding risks;
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- Ensure the safeguarding policy is reviewed annually and school procedures are updated and reviewed regularly;
- Ensure the policy is available publically and parents are aware that referrals about suspected abuse or neglect may be made and the role of the school in this;
- Link with the Local Authority Safeguarding Partnership to make sure staff are aware of training opportunities and the latest policies on safeguarding;
- Where children leave school, ensure their child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file.

DMS: Those in the DMS role will support the DSL in his/her role, and cover the above responsibilities when required to deputise.

Appendix A: Useful documents, contacts and links

Keeping Children Safe in Education (KCSiE): Statutory Guidance for schools and colleges (DFE)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSiE_2021_September.pdf

Working Together to Safeguard Children: a guide to inter-agency working to safeguard and promote the welfare of children (DFE 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf

Working Together: transitional guidance for Local Safeguarding Children Partnerships, local authorities, safeguarding partners, child death review partners, and the Child Safeguarding Practice Review Panel (DFE 2018)https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722307/22306/Working_Together-transitional_guidance.pdf

Local safeguarding children partnership contacts

<https://www.londonscb.gov.uk/london-scb-contacts/>

Working Together to Safeguard Children: Statutory framework: legislation relevant to safeguarding and promoting the welfare of children (DFE 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722307/Working_Together_to_Safeguard_Children_Statutory_framework.pdf

Guidance for safer working practice for those working with children and young people in education settings (Safer Recruitment Consortium, 2019)

<https://www.saferrecruitmentconsortium.org/GSWP%20May%202019%20final.pdf>

Mental Health and Wellbeing in Schools October 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/747709/Mental_health_and_wellbeing_provision_in_schools.pdf

Help, protection, education: concluding the Children in Need review June 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809236/190614_CHILDREN_IN_NEED_PUBLICATION_FINAL.pdf

Data Protection Toolkit www.gov.uk/government/publications/data-protection-toolkit-for-schools

When to Call Police

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

London Child Protection Procedures (5th edition) <https://www.londoncp.co.uk/>

Safeguarding in Schools: best Practice (Ofsted, Sept 2011)

Available in hard copy at school or online at www.ofsted.gov.uk/resources/100240

What To Do If You Are Worried a Child Is Being Abused (HM Government, 2015)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf Multiple copies distributed to schools. A summary version is also available.

Childline: www.childline.org.uk 08001111 (contact number for under 19s)

NSPCC dedicated helpline for both children and adults who are potential victims of sexual abuse in schools with the appropriate support and advice. This includes how to contact the police and report crimes if they wish. The helpline will also provide support to parents and professionals too. **0800 136 663**

NSPCC whistleblowing helpline for adults worried about a child: 0808 8005000
SMS- 88858 www.NSPCC.org.uk, or help@nspcc.org.uk

The Prevent duty Departmental advice for schools and childcare providers June 2015

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

PREVENT helpline: 0207 34072665; counter.extremism@education.gsi.gov.uk

Protecting children and adults from abuse in the UK and abroad

www.wscb.org.uk/wscb/downloads/file/160/protecting_children_and_adults_from_abuse_in_the_uk_and_abroad

Recruit Teachers from overseas, DFE, 2021 www.gov.uk/guidance/recruit-teachers-from-overseas

Searching, screening and confiscation

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf

Sexting in schools and colleges (UKCCIS, 2016)

www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB_1_.PDF

Staffing and Employment: Advice for Schools 2021

www.gov.uk/government/publications/staffing-and-employment-advice-for-schools;

NSPCC 'Underwear Rule' www.nspcc.org.uk/preventing-abuse/keeping-children-safe/underwear-rule/

Harmful Sexual Behaviour Framework www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool

Sexual violence and sexual harassment between children in schools & colleges (DfE - 2021)

[file:///H:/Downloads/Sexual violence and sexual harassment between children in schools and colleges.pdf](file:///H:/Downloads/Sexual%20violence%20and%20sexual%20harassment%20between%20children%20in%20schools%20and%20colleges.pdf)

Harmful Sexual Behaviour Framework (NSPCC 2019), <https://learning.nspcc.org.uk/media/1657/harmful-sexual-behaviour-framework.pdf>

Teaching Online Safety at School (DFE 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf

Safeguarding children and young people from knife crime www.gov.uk/government/publications/knife-crime-safeguarding-children-and-young-people-in-education

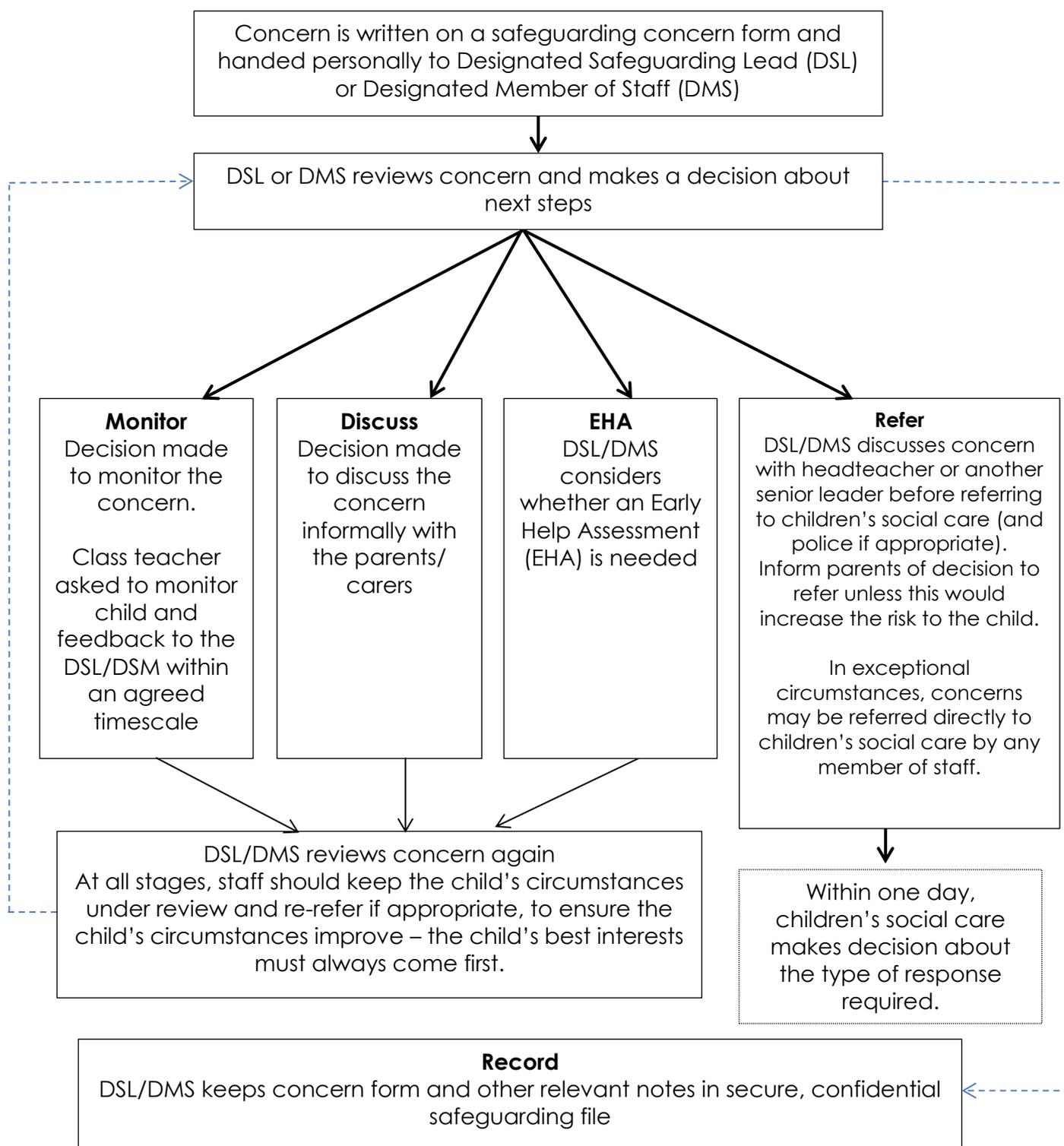
Vulnerable children in a digital world www.internetmatters.org/about-us/vulnerable-children-in-a-digital-world-report/

FGM mandatory reporting factsheet

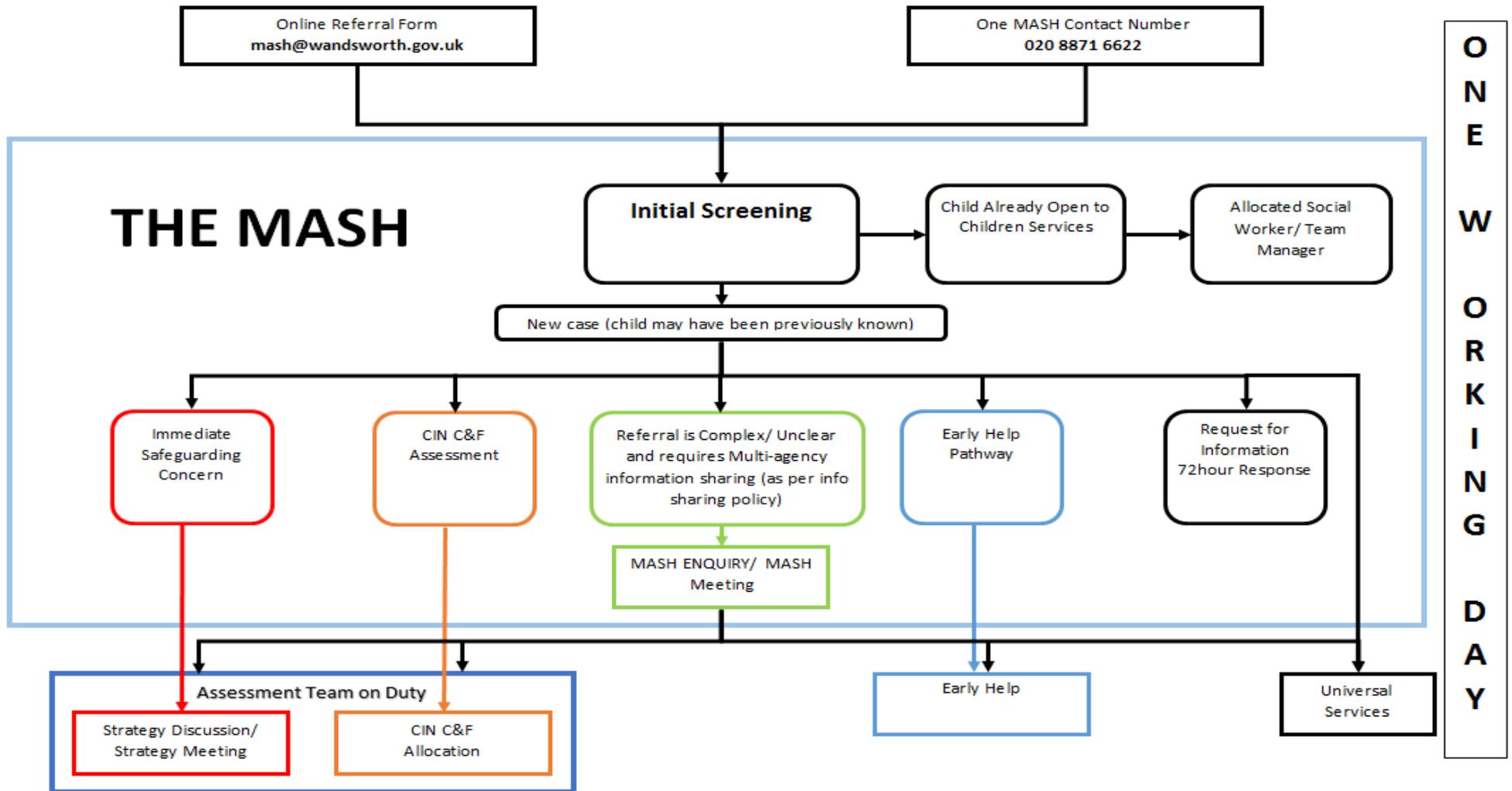
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

Education and Training (Welfare of Children) Act 2021 <https://www.legislation.gov.uk/ukpga/2021/16>

Appendix B - Flow chart for raising safeguarding concerns about a child



*This flowchart explains the process within school only. For more details of **other agencies'** processes for dealing with referrals (i.e. after the school has made a referral), please see the flowchart within Keeping Children Safe in Education (DfE 2019). For Wandsworth MASH see the flowchart below*



Appendix C - Guidance regarding potential signs of abuse

Drawn from the London Safeguarding Children Board (SCB) child protection procedures

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents / carers are uninterested or undisturbed by an accident or an injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shape. Those over 3 cm in diameter are more likely to have been caused by an adult or an older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discoloration over a bone or a joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

Scars

A large number of scars or scars of different sizes or ages, or on different parts of body, may suggest abuse

Behavioural Indications

Some children may behave in ways that alert you to the possibility of physical injury, for example

- Withdrawal from physical contact
- Fear of returning home
- Self-destructive tendencies
- Aggression towards others

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent / carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' – difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self-harming
- Running away

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting.

Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care

- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from or late for school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Compulsive stealing or scavenging

Recognising Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and / or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child / family. Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate for the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder, self-mutilation and suicide attempts)
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties)
- Concerning changes in behaviour or general presentation
- Regressive behaviour
- Distrust of a particular adult
- Unexplained gifts of money
- Sleep disturbances or nightmares
- Phobias or panic attacks

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl
- Physical symptoms such as injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen in vagina, anus, external genitalia or clothing
- Wetting or soiling

Please also refer to the Brook Traffic Light Tool listed in Appendix A for advice in what behaviours are a concern versus age appropriate exploration for support guidelines.

Child Sexual Exploitation

Some of the following signs may be indicators of sexual exploitation:

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

Appendix D: Example of concern or disclosure form

Safeguarding Concern Form					
Child's Full Name:		Class:		Date of Birth:	
Date:		Day:		Time:	
Name of staff member noting concern:			Role:		
Concern: (please describe as fully as possible)					
Signature:			Date:		
Now hand this to a Designated Member Staff (DMS) as soon as possible. Sections below to be completed by DMS only.					
Name of DMS:		Date and time received:		Signature of DMS:	
Action(s) Taken by DMS	Date	Time	Reason for action/ decision	Signature	

Appendix E – School report to Child Protection Conference (Primary)

School:			
Name of child:		Date of birth:	
Year group:		Name of class teacher:	
Attendance and punctuality			
Who brings and collects the child? Include after school arrangements			
Is the child prepared for school? e.g. PE kit; book folder, homework			
General appearance / presentation e.g. appropriate clothing, clean & tidy			
Emotional presentation e.g. happy, sad, anxious, preoccupied, withdrawn			
Academic progress/ attainment/areas requiring improvement Please note strengths & concerns			
Social development			
Relationships with adults			
Relationships with other children			
Home / school contact Are parent(s) easily contactable / supportive of school / attend parent's evenings / use PACT folders or diaries etc			
Any other areas of concern Please note any issues or specific incidents which have concerned you			
Name of person completing form:		Signature:	Date:

Appendix F - Mobile Pupil Confidential Report

School pupil is moving from:		School pupil is moving to:	
Name of child:		Date of birth:	
Does child have an EHA/SOWB/eCAF?	Yes/No		
Safeguarding/child protection			
Are there any safeguarding/child protection concerns?	Yes/No If yes: Have these been communicated to the school? Yes/No Have any relevant documents been forwarded to the school: Yes/No		
Any other comments:			
Special Educational Needs			
Does the child have any Special Educational Needs concerns:	Yes/No If yes: Have these been communicated to the school? Yes/No Have any relevant documents been forwarded to the school: Yes/No		
Any other comments:			
Please comment on any of the following areas which you feel we should be aware of:			
The child's character (e.g. social interaction, personal organization)			
The child's general behaviour			
The child's interests outside school and any wider achievements			
Any standardised scores e.g. reading age, NC Levels, NFER or academic concerns			
Family circumstances			
Attendance Record			
Any further comments			
Completed by		Position in School	Date

Please return to Designated Safeguarding Lead at the school address

Appendix G: LADO referral form

AGENCY REPORTING FORM FOR ALLEGATIONS AGAINST STAFF AND VOLUNTEERS WORKING WITH CHILDREN WITHIN THE LONDON BOROUGH OF WANDSWORTH

WHEN TO USE THIS FORM

This form must be filled in and sent to the Wandsworth MASH in every case where it is alleged or there are concerns that a person working with children has:-

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

Every incident should be recorded on this form and reported to the Wandsworth MASH.

If you are unsure as to whether the incident or concern needs to be referred, please ring the LADO to discuss. The LADO can be contacted on LADO@richmondandwandsworth.gov.uk or LADO@wandsworth.gov.uk – or 0208 8717440

If the matter is serious or there are **immediate** concerns for the child's safety or wellbeing, the referral must be made to Wandsworth MASH. MASH@wandsworth.gov.uk – 0208 8716622

If you do not have any relevant information for specific sections, please make this clear.

All allegations must be reported to the Wandsworth MASH within 24 hours (Working Together, Statutory Guidance, DfE, 2018)

You will be asked to provide associated relevant documentation once the information has been evaluated by the LADO. You will be advised regarding the appropriate action to be taken.

AGENCY Details

Date of referral	
Referrers name	
Referrers job title	
Place of work & address	
Tel number	
Email	
Best contact times	
Who is your Designated Manager/Child Protection Lead	
If a school, please give contact details of Head and Chair of Governors	
Status of organisation e.g. LA, private, voluntary, etc	
Who is your HR lead for allegations against staff	

Allegation Details

Date of alleged incident				
Date allegation reported to referrer				
Category of Abuse Alleged – please tick	Physical	Emotional	Sexual	Neglect

Does this referral concern mishandling of medication – if so, please give details of medication concerned and purpose of the medication	
Who has made the allegation e.g. child, parent, other professional etc	
How was the allegation e.g. in person, by phone, letter and to whom	
Who else has been informed regarding allegation	
Full details of allegation	
Where is it alleged the incident took place	
What action if any has been taken regarding the allegation	
Is there an allegation of an injury and if so pl describe	
Has a member of staff seen the injury, if so, they may be asked to complete a body map diagram	
If injury has parent been advised to take child to GP and if so, have they done so?	
Are written incident reports available and if so by whom; please supply	
Are there witnesses to the alleged incident; please give details	
If there has been a delay in reporting the allegation state why	
Are the parents/carers of the child aware of the allegation and if so state when /their views	
Is the child aware of the referral and if so when, and what their views are	
Did an allegation of physical abuse follow an authorised / unauthorised restraint?	Yes No
If the allegation relates to restraint has staff member had Team Teach or similar training and when	

Details of person/s subject to the allegation please repeat box if more than one person

Person subject to allegation known/unknown	
First name	
Surname	
Title	
Job title	
DOB	
Home address	
Ethnicity	
Length of employment	
Date of last DBS	
Details of references taken up	
What is the status of the employment e.g. f/t, p/t, agency, volunteer etc	
If agency etc please give contact details	
Have they been subject to previous	

allegations and if so, please provide full details	
Are there any other concerns/issues of relevance regarding this person	
Does this person work in any other capacity with children either paid/unpaid?	
Does this person have children of their own? If so, please provide name(s), DOB(s) and address details	
Has the person been suspended/advice taken from HR	

Details of potential victim/child please repeat box if more than one child

Alleged victim known or unknown/no victim	
First name	
Surname	
DOB	
Gender	
Ethnicity/Religion	
Home address/tel.	
Parent's/carers names/contact details	
Who has PR for the child	
First language of child and parents/carers – is an interpreter required	
Issues of disability/communication/literacy for child or parent/carer	
Any other family members/significant persons for this child	
Has the child made a previous allegation and if so, please give details	
Is/has this child been Looked After or subject to a Child Protection Plan, Child in Need Plan	
GP / Health Visitor / School Nurse details	
Are there any known concerns about this child / young person	
Other information of relevance re this child and the allegation	

Please give details of any other information of relevance

Referrer's name:

Referrer's signature:

(please add electronically)

Date:

Appendix H - Neutral Notification Reporting Form

Name of person completing the form	
Day/Date/Time	
Form Handed to:	
Please circle:	self report report about other
Countersigned by DSL/DMS	

Notification Include relevant background (continue on separate sheet if necessary and number each page)

Signature:

Date:

Appendix I – Relevant Parts of KCSIE 2021 to read

All staff with direct contact with children	Should read Part 1 and Annex A
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In addition:

Headteachers and DSLs	Should read the whole policy (DSLs should ensure Annex B is included in their job description)
Headteachers, senior leaders, behaviour leads and designated members of staff for safeguarding	Should read part 5
Local governors and trustees	Should read at least parts 2, 3, 4 and 5
Designated local governors and trustees for safeguarding	Should read the whole policy
Anyone involved in recruitment and/or SCR (including recruiters/ managers of volunteers)	Should read part 3 paragraphs 191-194 and annex E
HR staff	Should read the whole policy but concentrate on parts 3 and 4 and annexes F and G
Anyone in classroom-based roles, ICT or network roles	Should read Annex C
Anyone involved in allegations and concerns against staff, including Heads, DSLs, SLT, HR, Local governors and Trustees	Should read part 4
Governors and proprietors can identify staff who Do Not have direct contact with children, who may only need to read the condensed Part 1 in Annex A.	

Appendix J - Risk Assessment Template for Volunteers working in Schools who are NOT in Regulated Activity (Print Version)

This risk assessment template may be used by schools when deciding whether to obtain an enhanced DBS certificate for regular volunteers who are NOT engaged in regulated activity, in line with Keeping Children Safe in Education. This would NOT be appropriate for volunteers who simply assist with day-time school trips.

Name of Volunteer		Start Date	
Person conducting the risk assessment			

Is the Volunteer going to be working in Regulated Activity¹? [tick one box]

- A** Yes (If “Yes” you **must** obtain an Enhanced DBS certificate with Barred List check and you do **not** need to fill out this risk assessment further)
- B** No (If “No” you may choose to obtain an Enhanced DBS certificate **without** a Barred List check, based on this risk assessment and your professional judgement)

Factors to Consider	Description	Guide to Risk Score 1=Low risk 2=Moderate Risk 3=High risk	Risk score
Will they have direct contact with children?		1=No Contact 2=Some Contact 3=Regular Contact	
Frequency of working directly with children?		1=Never/rarely 2=Occasionally 3=Frequently	
Age range of the children?		n/a	
Any contact with children particularly vulnerable?		1=No Contact 2=Some Contact 3=Regular Contact	
Assisting with any personal care?	(If “yes” the Volunteer is Regulated Activity, tick box A above)	1=No Personal Care 2=Some Personal Care=Regulated Activity	
What tasks will they be doing?		1=low risk/simple tasks 2=moderate risk/more complex tasks 3=high risk/complex tasks	
Frequency of working in the school?		1= Occasionally 2=2-3 times a term 3=weekly+	
Will they be working with children outside of school hours? when?	(Work between 2am and 6am is Regulated Activity, tick box A above)	1=None 2=Occasionally 3=Frequently 2-6am=Regulated Activity	
Will they be working with children off school premises? Where? When?		1=Never/rarely 2=Occasionally 3=Frequently	
Is the school a residential		1=No 3= Yes	

¹ Refer to Annex F in Keeping Children Safe in Education for the Statutory Definition of Regulated Activity

setting?			
What is the association of the Volunteer with the school?		1=strong links eg ex staff 2=some eg parent/ex pupil 3=none or weak link	
How well does the school know the history of the Volunteer?		1=Well Known 2=Some knowledge 3=Little or none	
What do you believe is their reason for volunteering?		1=positive/sound reasons 2=acceptable /neither good nor bad 3=not known/personal gratification	
Can the volunteer provide a relevant reference from someone they have worked or volunteered for?		1=Yes 3= No	
Can the volunteer provide a reference from someone who knows their work with children?		1=Yes 3= No	
Does the volunteer have a history of paid or voluntary work with children?		1=Currently working 2=Worked within 5 years 3=Over 5 years ago 4=Never worked with children	
Does the Volunteer have a recent DBS certificate from another role?		1=Yes within 12 months 2=Yes over 12 months 3=No	
Is the Volunteer currently signed up to the DBS update service?		1=Yes for a similar role 2=Yes for different role 3=No	
Are there any known or suspected concerns around working children?		1=No concerns 2=Don't Know 3=Some concerns	
Any other factors to be taken into account.			

Total Risk Rating [total up the risk scores for each factor]			
Overall Risk level [tick one box – refer to guide below]	High <input type="checkbox"/>	Medium <input type="checkbox"/>	Low <input type="checkbox"/>

Guide to assessing risk level

(remember this is only a rough guide and individual schools should determine their own risk levels)

<30

Low Risk. A score of less than 30 points suggests the volunteer is well known to the school, has probably got some experience of previous work with children and can provide a reference and is generally working on school premises and within normal school hours with children who are not deemed particularly vulnerable. They may be a previous employee, governor or volunteer and/or well known to staff or colleagues. They may hold a recent DBS certificate which has been seen or a portable DBS

Action: there is no legal requirement to carry out a further DBS check but if the person doesn't hold a portable DBS they may wish to consider carrying out an enhanced DBS check with NO Barred List check

30-40

Moderate Risk. A score between 30-40 points suggests the volunteer has some connection with the school, perhaps as a parent and may have done some similar voluntary work in the past. No particular issues have come to light and there are no concerns over their suitability. The person has provided suitable references. They may work regularly with children where occasionally some of these children are deemed vulnerable. They do not have recent or portable DBS check.

Action: there is no legal requirement to carry out a further DBS check however the school may wish to consider carrying out an enhanced DBS check with NO Barred List check

41+

High Risk. A score of above 40 points suggests that the volunteer has no previous connection with the school and is not known to staff at the school and cannot provide relevant references as to their suitability to work with children. They do not hold a current DBS or portable DBS check or they may be expected to work directly with children who may be particularly vulnerable or off school premises and out of hours.

Action: there is no legal requirement to carry out an enhanced DBS check, however it is recommended that the school consider carrying out an enhanced DBS check with NO Barred List check.

Agreed Action: [tick box]

Enhanced DBS Check **NOT** required? Enhanced DBS Check **IS** needed?

Comment on reason:

Signed Off:

Name of person Signing off risk assessment:

Role:

Signature:

Date:

Appendix K - Responding to Sexual Abuse Disclosures Flow Chart

**PART FOUR:
RESPONSE TO REPORTS**
Summary of responses

REPORT RECEIVED
(from the victim or third-party)
[Onsite, offsite or online]

Definitions
Sexual Violence
Rape
Assault by penetration
Sexual assault

Sexual Harassment
Unwanted conduct of a sexual nature, including sexual remarks, sexual taunts, physical behaviour or online sexual harassment

Victim reassured

- taken seriously and kept safe
- confidentiality not promised
- listen to victim, non-judgementally
- record the disclosure (facts as reported)
- two staff present (one being the DSL, or reported to DSL as soon as possible)
- victim sensitively informed about referral to other agencies
- if victim does not give consent to share, staff may still lawfully share in order to protect child from harm and to promote the welfare of children (see 'Sexual Violence and Sexual Harassment' paragraph 43)
- parents of victim informed

Anonymity
Note that in cases of sexual violence there is legal protection of the victim's identity. Remember that this also includes sharing on social media and discussion amongst pupils in the school.

Record-keeping
Remember, to record all concerns, discussions, decisions and reasons for decisions.

Considerations
(Sexual Violence, Sexual Harassment and Harmful Sexual Behaviours)
Immediately: Consider how to support the victim and the alleged perpetrator

- wishes of the victim
- nature of the alleged incident
- ages of the children
- development stage of the child
- any power imbalance
- one-off, or part of a pattern of behaviour
- any ongoing risks
- other related issues and wider context

MANAGE INTERNALLY
One-off incidents which the school believes that the child(ren) are not in need of early help or statutory intervention, which would be appropriate to deal with internally under the school's behaviour policy or anti-bullying policy.

EARLY HELP
Non-violent Harmful Sexual Behaviours (see Harmful Sexual Behaviours Framework (NSPCC) and the Brook Traffic Light Tool)

REFER TO SOCIAL CARE
All incidents where a child has been harmed, is at risk of harm or is in immediate danger.

Social Care staff will decide next steps. Be ready to escalate if necessary.

REFER TO POLICE
All incidents of rape, assault by penetration or sexual assault.

Discuss next steps with police, for example, disclosing information to other staff, informing alleged perpetrator and their parents.

RISK ASSESSMENT
Case-by-case basis

RISK ASSESSMENT
Immediately

Do not wait for outcome of referral before protecting victim.

Emphasis on victim being able to continue normal routines.

Alleged perpetrator removed from any classes with victim (also consider shared spaces and journey to/from school)
[Not a judgement of guilt]

SAFEGUARD AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR
(see separate page)

SAFEGUARD AND SUPPORT VICTIM AND (ALLEGED) PERPETRATOR
(see separate page)

DISCIPLINARY MEASURES TAKEN
(see school's Behaviour Policy/Anti-bullying Policy)

DISCIPLINARY MEASURES TAKEN
(may be undertaken based on balance of probabilities, unless prejudicial or unreasonable)

CRIMINAL PROCESS ENDS

- ▶ **Conviction or Caution:** follow behaviour policy, consider Permanent Exclusion. If pupil remains in school, make clear expectations; keep victim and perpetrator apart. Consider victim's wishes.
- ▶ **Not Guilty:** Support victim and alleged perpetrator
- ▶ **No Further Action:** Support victim and alleged perpetrator

Ensure actions do not jeopardise the investigation
School to work closely with police and/or other agencies

Appendix L - Managing allegations against staff: Flow Chart

