

## DUDLEY ACADEMIESTRUST

### Child Protection and Safeguarding

Issue number:	003
Responsible:	Compliance & Safeguarding Officer
Approved by:	Board of Trustees
Date:	September 2020
Review date:	July 2021

# Child Protection & Safeguarding Policy

<b>Academy Name:</b>	Blowers Green Primary School
<b>Headteacher:</b>	Mrs S. Sehmbi
<b>Designated Safeguarding Lead:</b>	Mrs Z Adams
<b>Deputy Designated Safeguarding Leads:</b>	Miss C Parkes Mrs S Sehmbi
<b>Safeguarding Lead for The Local Advisory Committee:</b>	Mrs P Hazlehurst
<b>Date Last Reviewed:</b>	September 2019
<b>Date Next Review Due:</b>	July 2021
<b>Safeguarding Designated Officer:</b>	Mr P Townsend
<b>Local Authority Designated Officer:</b>	Alyson Sayers Rebecca Jessup
<b>Dudley Academies Trust Chief Executive Officer:</b>	Ms J Higgins

## Contents

Aims.....	6
Legislation and Statutory Guidance .....	6
COVID-19 .....	7
Definitions .....	7
Equality Statement.....	8
Roles and Responsibilities.....	8
All Staff.....	8
The Designated Safeguarding Lead (DSL).....	9
Deputy Designated Safeguarding Leads.....	10
The Board of Trustees.....	10
The Headteacher.....	10
Multi-agency Working .....	11
Checking The Identity and Suitability of Visitors.....	12
Information Sharing and Confidentiality .....	12
Recognising Abuse and Taking Action .....	14
A Child Is Suffering or Likely to Suffer from Harm, Or in Immediate Danger.....	14
A Child Makes a Disclosure to You .....	15
Out of Hours' Disclosures.....	15
Serious Violence Including Knife Crime .....	16
If You Discover That Female Genital Mutilation (FGM) Has Taken Place or A Pupil Is at Risk of FGM .....	16
Concerns About a Child (As Opposed to Believing a Child Is Suffering or Likely to Suffer from Harm, Or in Immediate Danger) .....	17
Early Help .....	17
Referrals.....	18
Section 47 Referrals.....	18
Section 17 Referrals.....	19
Concerns About Extremism .....	19
Concerns About Mental Health .....	21
Concerns About a Staff Member (Including Supply Staff or a Volunteer) .....	21
Allegations of Abuse Made Against Other Pupils.....	21
Sexting.....	22
Initial Review Meeting .....	23
Further Review by The DSL .....	23

Informing Parents/Carers .....	24
Referring to The Police.....	24
Recording Incidents .....	24
Curriculum Coverage.....	<b>Error! Bookmark not defined.</b>
Searching, Screening and Confiscation .....	<b>Error! Bookmark not defined.</b>
On-line Safety .....	24
Notifying Parents/Carers .....	25
Pupils with Special Educational Needs and Disabilities .....	26
Pupils with A Social Worker.....	26
Looked-After and Previously Looked-After Children.....	27
Mobile Phones and Cameras.....	27
Staff Misuse .....	28
Complaints and Concerns About School Safeguarding Policies.....	28
Complaints Against Staff.....	28
Other Complaints .....	28
Whistle-blowing.....	28
Record-keeping.....	28
Training .....	29
All Staff.....	29
The DSL and Deputy/Deputies .....	29
Local Advisory Committee .....	30
Recruitment – Interview Panels.....	30
Staff Who Have Contact with Pupils and Families .....	30
Monitoring Arrangements .....	30
Links with other policies .....	30
Appendix 1: Types of Abuse .....	32
Physical Abuse.....	32
Emotional Abuse .....	32
Sexual Abuse .....	32
Neglect .....	32
Peer On Peer Abuse .....	33
Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures.....	34
New Staff.....	34
Regulated Activity .....	35
Existing Staff.....	35

Agency and Third-Party Staff.....	36
Contractors.....	36
Trainee/Student Teachers.....	36
Volunteers.....	37
Trustees/Local Advisory Committee Members.....	37
Associate Members.....	37
Staff Working in Alternative Provision Settings.....	37
Suspension of The Accused Until the Case Is Resolved.....	38
Definitions for Outcomes of Allegation Investigations.....	38
Procedure for Dealing with Allegations.....	39
Timescales.....	41
Specific Actions.....	41
References.....	42
Learning Lessons.....	42
Appendix 4 – Specific Safeguarding Issues.....	44
Children Missing from Education.....	44
Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).....	44
Domestic Abuse.....	45
Homelessness.....	46
Mental Health.....	46
So-Called ‘Honour-Based’ Abuse (Including FGM and Forced Marriage).....	47
FGM.....	47
Forced Marriage.....	48
Preventing Radicalisation.....	49
Self-Harm and Mental Health.....	51
Harmful Sexual Behaviour.....	51
County Lines.....	51
Looked After Children and Previously Looked After Children.....	52
Private Fostering.....	52
Young Carer.....	52
Non-collection of Pupils.....	52
Missing Pupils.....	53

## Aims

Blowers Green Primary School aims to ensure that:

- Safeguarding is of paramount importance to everyone working, attending and visiting the School.
- Contextual safeguarding will include all aspects of school life, home environments and the wider community.
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.
- A safe environment is created where children can succeed and are equipped with the skills needed to keep themselves safe.
- Children that have been abused are supported through multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#) and internal intervention.

## Legislation and Statutory Guidance

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

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- [Section 5B\(11\) of the Female Genital Mutilation Act 2003](#), as inserted by section [74 of the Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the [Counter-Terrorism and Security Act 2015](#) with respect to protecting people from the risk of radicalisation and extremism.
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#),

which set out who is disqualified from working with children. This policy also complies with our funding agreement and articles of association.

## COVID-19

All staff will continue to have appropriate regard to [Keeping Children Safe in Education 2020](#) (KCSIE) and the Department for Education's guidance on [Coronavirus \(COVID-19\): Safeguarding in Schools, Colleges and Other Providers](#) and these will remain in force throughout the response to coronavirus (COVID-19) to keep our pupils safe.

The way we are operating in response to coronavirus continues to be different to business as usual however, a number of important safeguarding principles remain the same:

- The best interests of children must always continue to come first.
- If anyone in the school has a safeguarding concern about any child, they should continue to act and act immediately.
- A DSL or deputy should be available.
- It is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children.
- Children should continue to be protected when they are online.

## Definitions

Safeguarding and promoting the welfare of children means:

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

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. Child Protection will include the unborn child until they are 18 and 25 with SEND.

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

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

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

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

The following **3 safeguarding partners** are identified in [Keeping Children Safe in Education 2020](#) (and defined in the [Children Act 2004](#), as amended by chapter 2 of the [Children and Social Work Act 2017](#)). They will make arrangements to work together to

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

- The Local Authority (LA).
- A clinical commissioning group for an area within the LA.
- The Chief Officer of Police for a police area in the LA area.

## Equality Statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities.
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after (see [Looked-After and Previously Looked-After Children section](#)).

## Roles and Responsibilities

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

### All Staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2020](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this Child Protection and Safeguarding policy, the school's Disciplinary policy, the role and identity of the Designated Safeguarding Lead (DSL) and Deputy/Deputies, the Behaviour Policy, and the safeguarding response to children who go missing from education.

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

The Training section and [Appendix 4](#) of this policy outline in more detail how staff are supported to do this.

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

The DSL lead is a member of the Senior Leadership Team and takes lead responsibility for child protection and wider safeguarding (including online safety) and will keep the Headteacher informed of any issues especially ongoing enquiries under section [47 of the Children Act 1989](#) and Police investigations.

Our DSL is **Mrs Zoe Adams**, Deputy Headteacher.

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

When the DSL is absent, the following Deputy/Deputies will act as cover:

**Mrs Surinder Sehmbi**, Headteacher

**Miss Cara Parkes**, HLTA

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

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

In addition to the formal training the DSL should:

- Ensure the school’s child protection policies are known, understood and used appropriately.

- Ensure the school’s child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this.
- Ensure the child protection policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.

The DSL lead and any deputies will liaise with the three safeguarding partners and work with other agencies in line with [Working Together to Safeguard Children](#).

### Deputy Designated Safeguarding Leads

The deputy designated safeguarding leads should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

### The Board of Trustees

The Board of Trustees will approve this policy at each review, ensure it complies with the law and hold the Headteacher to account for its implementation.

The Board of Trustees will appoint a senior board level (or equivalent) to monitor the effectiveness of this policy in conjunction with the full Board of Trustees. This is always a different person from the DSL.

The Chair of Trustees will act as the ‘case manager’ in the event that an allegation of abuse is made against the Headteacher, where appropriate (see [Appendix 3](#)).

All Trustees will read [Keeping Children Safe in Education \(2020\)](#).

The Training section has information on how Trustees are supported to fulfil their role.

### The Headteacher

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

- Ensuring that staff (including supply staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.

- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3) liaise with LADO.
- Ensuring the relevant staffing ratios are met, where applicable.

## Multi-agency Working

The academy plays a pivotal role in multi-agency safeguarding arrangements. The Local Advisory Committee will ensure that the academy contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).

The Dudley Safeguarding People Partnership Board (DSPPB) is made up of representatives from Dudley Council, West Midlands Police, NHS and voluntary sector. The partnership arrangement reflects our legal responsibility to comply with the [Working Together to Safeguard Children](#) statutory framework and also a shared ambition and commitment to safeguard and promote the welfare of children, including identifying and responding to their needs (see [Dudley Safeguarding People Partnership Arrangements](#)).

The Black Country Child Death Overview Panel (CDOP) operates as a parallel group to the multi-agency safeguarding arrangements and has been set up by Child Death Review (CDR) Partners:

- City of Wolverhampton Council
- Dudley CCG
- Dudley Metropolitan Borough Council
- Sandwell and West Birmingham CCG
- Sandwell Metropolitan Borough Council
- Walsall CCG
- Walsall Metropolitan Borough Council
- Wolverhampton CCG

[Working Together to Safeguard Children](#) requires CDOP to oversee the review of deaths of children under the requirements of the [Children Act 2004](#) and [Working Together to Safeguard Children](#).

We work in partnership with other agencies to promote the best interests of our pupils as a top priority in all decisions and actions that affect them. The academy will, where necessary, liaise with these agencies and make requests for support from children’s social care. Where the child already has a safeguarding social worker or family support worker, the request for support should go immediately to the team involved, or in their absence to their team manager.

When invited the Designated Safeguarding Lead (DSL) will participate in a MASH strategy meeting, usually by conference phone, adding school held data and intelligence to the discussion so that the best interests of the child are met.

We will co-operate with any child protection enquiries conducted by children’s social care: the academy will ensure representation at appropriate inter-agency meetings such as

integrated support plan meetings initial and review child protection conferences, and core group meetings.

We will provide reports as required for these meetings. If the school is unable to attend, a written report will be sent. The report will, wherever possible, be shared by Social Care with parents/carers at least 24 hours prior to the meeting.

Where a Pupil is subject to an inter-agency child protection plan or a multi-agency risk assessment conference (MARAC) meeting, the academy will contribute to the preparation, implementation and review of the plan as appropriate.

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

All visitors will be required to verify their identity to the satisfaction of staff at reception.

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

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

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

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

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

## **Information Sharing and Confidentiality**

Information sharing is vital in identifying and tackling all forms of abuse and neglect.

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

The [Data Protection Act 2018](#) and [GDPR](#) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Staff should have due regard to the relevant data protection principles which allow them to share (and withhold) personal information, as provided for in the [Data Protection Act 2018](#) and [GDPR](#). This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as ‘special category personal data’.
- Understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- For schools, not providing pupils personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met they must withhold providing the data in compliance with school’s obligations under the [Data Protection Act 2018](#) and the GDPR. Where in doubt seek independent legal advice.

Further details on information sharing can be found:

- in Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing.
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful.
- at [The Information Commissioner’s Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from the department.
- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.

We recognise that all matters relating to child protection are confidential and note that:

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- [The Data Protection Act \(DPA\) 2018](#) and [GDPR](#) do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share ‘special category personal data’, the [DPA 2018](#) contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests.
- The government’s [information sharing advice for safeguarding practitioners](#) includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information.

- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff in [Appendix 3](#).

## **Recognising Abuse and Taking Action**

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 practitioners 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.

No single practitioner 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.

Safeguarding and promoting the welfare of children is defined 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.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) 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.

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

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

## **A Child Is Suffering or Likely to Suffer from Harm, Or in Immediate Danger**

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

Tell the DSL as soon as possible if you make a referral directly.

You can also report child abuse to your Local Authority by following the link to the GOV.UK webpage for reporting child abuse to your local council:

## A Child Makes a Disclosure to You

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

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

Staff must **immediately** discuss any concerns or disclosures, in the first instance, directly with the DSL. If staff are teaching they must, **without delay**, call for support in conveying the disclosure to the DSL. It is not permitted to send disclosures via email, to protect the risk of accidentally sending confidential/sensitive information to an incorrect recipient.

### Out of Hours' Disclosures

In the event that a disclosure happens whilst on a school trip:

If during the school day:

- follow the usual procedure for safeguarding but call the base contact and ask to speak to the DSL immediately and relay the information over the telephone for advice.

If during the evening or out of school hours:

- call the emergency contact on the risk assessment and inform them – this is usually the Headteacher.
- Follow the usual process with regard to writing down the disclosure.
- If the child is in immediate danger or the child is not safe to return home or you feel they would be at risk of harm if they went home, then contact **999**. Ensure the child is kept safe with a member of staff whilst you do this. If you are unsure contact the MASH for advice (ask the child their address, and call the appropriate MASH according to where they live).
- **DO NOT** let the child leave school with anyone if you are concerned about their welfare. Take advice from MASH/Police/Base Contact.

### Dudley MASH

MASH number 0300 555 0050 (9:00am-5:00pm) or 0300 555 8574 (out of hours).

MARF FORM -<https://safeguarding.dudley.gov.uk/report-it/> under for practitioners and those working with children section.

### **Sandwell MASH**

MASH Number 0121 569 3100 – this is for both office hours and out of hours.

MARF Form - <https://www.sandwellcsp.org.uk/key-safeguarding-issues/report-a-concern/>.

### **Wolverhampton Mash**

MASH number – 01902 555 392 (8:30am-5:00pm) or 01902 552 999 (out of hours).

MARF Form - <https://marf.wolverhampton.gov.uk/>.

## **Serious Violence Including Knife Crime**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school.
- a change in friendships or relationships with older individuals or groups.
- a significant decline in performance.
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. A report instigated by Ofsted [Knife Crime: Safeguarding Children and Young People in Education](#) addresses some of the factors that can contribute to keeping children safe from crime and recommendations in an attempt to overcome some of the challenging issues.

## **If You Discover That Female Genital Mutilation (FGM) Has Taken Place or A Pupil Is at Risk of FGM**

The Department for Education's [Keeping Children Safe in Education 2020](#) explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

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

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

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must

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

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

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

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

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

## **Concerns About a Child (As Opposed to Believing a Child Is Suffering or Likely to Suffer from Harm, Or in Immediate Danger)**

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

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

### **Early Help**

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

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

The Early Help Assessment forms are a key part of the Early Help Strategy and is a simple way to help identify the needs of children, young people and their families and make a plan to meet those needs. It is designed to be a shared tool which can be used by all agencies in Dudley who are delivering early help. It is a standardised approach so that all children and families have the same experience of identifying their needs, strengths and challenges. It also means that all agencies and partners are operating the same system which ensures consistency right across the partnership. Parents/carers will give both verbal and written consent. The completed forms will be forwarded to the DSL to complete an Early Help

Assessment with the family. This will be returned to the Family Centre where the parent/carer resides.

The approach of early identification puts children and young people at the heart of the assessment and will prevent issues escalating to statutory services.

It is vital that all staff are aware of the Early Help Procedure and the support that is available for our families ([KCSIE](#)). In order to do this most effectively, all staff receive training and regular updates on the Early Help process.

The DSL or Deputy DSL will attend the Multi Agency Allocation Meetings (MAAM) at the Family Centre to assess the case against threshold. Staff from the academy will attend all Early Help meetings and contribute to the Support Plan, reviewing and taking the role of Lead Professional when required. The DSL will attend bi-annual strategic reviews with the Local Authority regarding the Early Help provision.

The DSL will follow the guidelines set out in the [Dudley Early Help Strategy 2018 – 2021](#).

## Referrals

When making a referral, have the following ready wherever possible:

- Make sure you are clear on the information you have.
- Use a telephone near a computer where possible in case you require SIMS.
- Use SIMS if possible to get the child's full name and date of birth and parental name and addresses.
- The MASH team of where the child lives need to be informed. The majority of pupils live in Dudley but some may live in Sandwell or Wolverhampton.
- If you think a child is in immediate danger always call 999.

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. [NSPCC](#) – When to call the police helps DSL's understand when they should consider calling the police and what to expect when they do.

If you make a referral directly, you must tell the DSL as soon as possible.

### Section 47 Referrals

A child in need of protection is described in [section 47 of the Children Act 1989, Paragraph \(1\) and Children Act 2004](#).

Where a local authority has reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, where the child lives or is found in the authority's area, they shall make or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare.

If a child is thought to be or has disclosed risk of significant harm, the DSL will notify the Multi-Agency Safeguarding (MASH) Team by phone immediately and then through the completion of a Multi-Agency Referral Form (MARF). Parents/Carers will be notified if safe to do so, or unless advised by the MASH Team not to do so. Where necessary, the MARF may also be accompanied by a referral to the Police.

## Section 17 Referrals

The definition of 'children in need' is defined by the [Children Act 1989 s17](#).

If a child is:

- unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a local authority or
- their health or development is likely to be significantly impaired, or further impaired, without the provision for him of such services; or
- he is disabled.

If a child is in need of higher level support than an Early Help Plan but is not at risk of significant harm, then a MARF will be completed with parental/carer knowledge and agreement to Children's Services.

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

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

## Concerns About Extremism

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

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

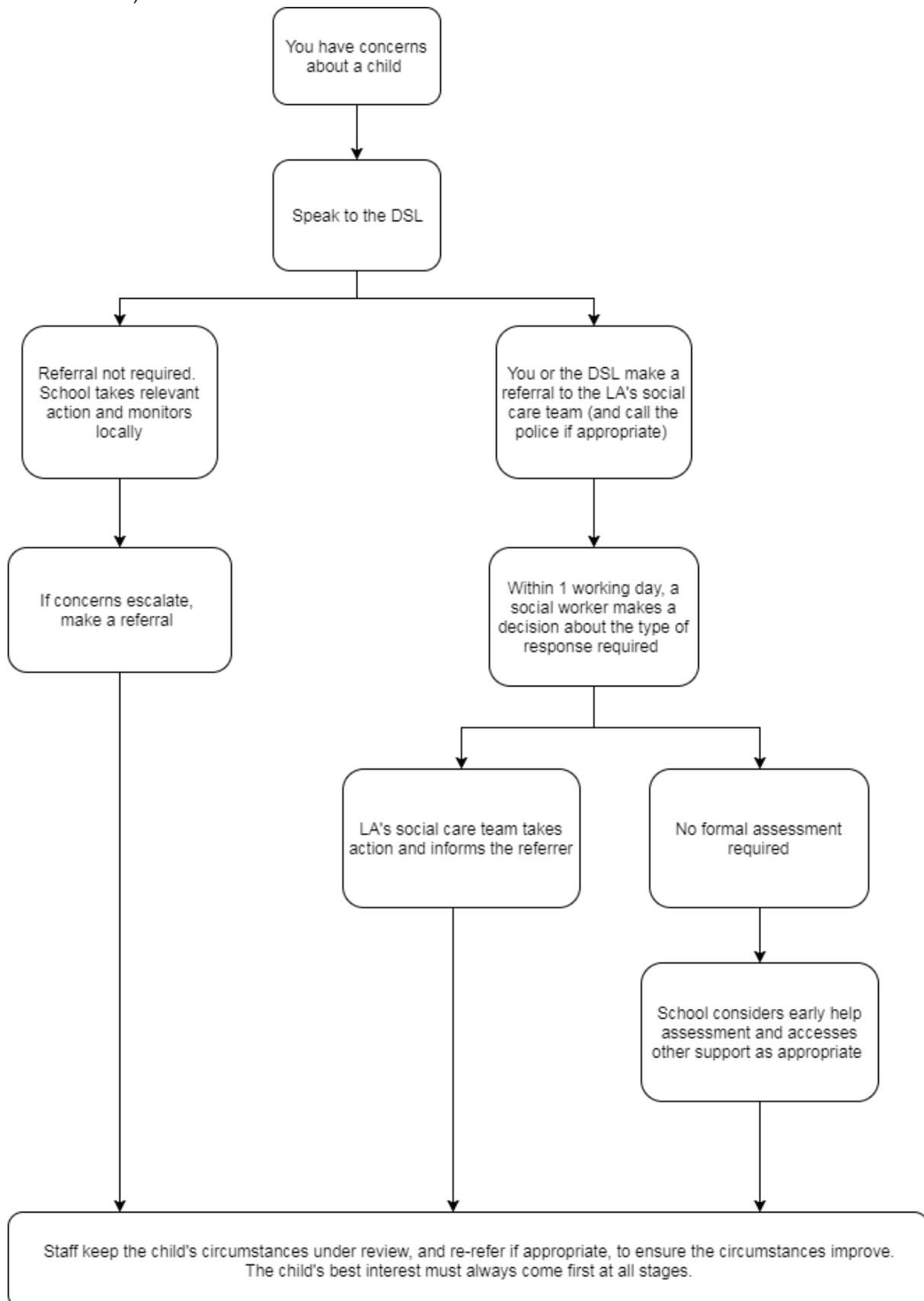
Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the Local Authority children's social care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

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

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

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

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**  
 (Note – if the DSL is unavailable, this should not delay action. See 'The Designated Safeguarding Lead' section for what to do.)



## Concerns About Mental Health

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps under section '[If You Have Concerns About a Child](#)'.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. This must include informing the parent/carer and advising them to seek professional support from the families General Practitioner services or to attend Accident and Emergency departments at their local hospital, should they be concerned their child is at risk of serious harm from themselves.

## Concerns About a Staff Member (Including Supply Staff or a Volunteer)

If you have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:

- This should be referred to the Headteacher.
- Where there are concerns/allegations about the Headteacher, this should be referred to the Chair of the Trust Board.

## Allegations of Abuse Made Against Other Pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

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

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

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

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

- You must record the allegation and tell the DSL, but do not investigate it.

- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils know they can talk to staff confidentially.
- Ensuring staff are trained to understand that a Pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

## Sexting

‘Sexting’ is one of a number of ‘risk-taking’ behaviours associated with the use of digital devices, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with online activity can never be completely eliminated. The school recognises its duty of care to its young people who do find themselves involved in such activity as well as its responsibility to report such behaviours where legal or safeguarding boundaries are crossed.

We will follow the UK Council for Child Internet Safety (UKCCIS) non-statutory guidance [Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People](#) on managing incidents of sexting by under-18s.

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

You must **not**:

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

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

### Initial Review Meeting

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

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

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

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

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

### Further Review by the DSL

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

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

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

## Informing Parents/Carers

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

## Referring to The Police

If it is necessary, the incident will be referred to the Police by dialling 101.

## Recording Incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in the 'Record Keeping' section of this policy and also apply to recording incidents of sexting.

## On-line Safety

As we increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. Where children are being asked to learn online at home, the Department for Education has provided advice to support schools do so safely: [safeguarding-in-schools-colleges-and-other-providers](#) and [safeguarding-and-remote-education](#).

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation, radicalisation; sexual predations: technology often provides the platform that facilitates harm. Our academy will endeavour to provide activities and opportunities in the PSHE curriculum that will equip our pupils with the necessary skills they need to stay safe. This may include covering relevant issues through Relationships Education.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; for example, fake news, racist or radical and extremist views;
- **Contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults;
- **Conduct:** personal online behaviour that increased the likelihood of, or causes harm; for example, making, sending and receiving explicit images, or online bullying.

Child protection and wider child safety issues will be addressed through the curriculum as appropriate. Relevant issues will be addressed, for example this may include self-esteem, emotional literacy, assertiveness, power, relationships, online safety and bullying. The following resources are available to support schools:

- [Be Internet Legends](#) developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils.
- [Education for a connected world framework](#).
- [PSHE Association](#) provides guidance to schools on developing their PSHE curriculum.

- [Teaching online safety in school.](#)
- [Thinkuknow](#) is the National Crime Agency/CEOPs education programme with age specific resources.
- [UK Safer Internet Centre](#) developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.

### **Additional Support**

The Academy is committed to providing the earliest levels of support. Safeguarding issues that do not meet Threshold for outside agency support will be offered a wide range of help in school. Intervention work will be recorded and the data used to track trends and vulnerable groups. Intervention will also take form of preventative and educational workshops, small group work and 1:1 sessions for example through ‘wishes and feelings’ work.

### **Emotional Well-being**

Self – harming behaviour will automatically be referred to the GP for assessment via the safeguarding route. Students experiencing poor Mental Health that do not meet the threshold for CAMHS or other external agencies, can be referred for Emotional Well Being sessions. Low Self-Esteem and Self-Worth, anxiety, or students exiting CAMHS support, can all be referred for this intervention.

The aim is to support and offer practical steps to self-protect. It will monitor and refer on if conditions become more serious. The sessions will improve positive Mental Health, raise awareness for the individual and sign post to other support networks.

### **Positive Steps**

The school nurse will accept referrals for pre-CAMHS work with students experiencing poor mental health that has been ongoing despite the intervention of pastoral staff. It will be used as an assessment of need and can be used to directly refer into CAMHS if needed.

### **E-Safety**

Following an incident involving unsafe or risky behaviour using a computer in school, notification will be sent through with pupil details via the ESafe security software. 1:1 direct work will be carried out to further assess the level of concern.

## **Notifying Parents/Carers**

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents/carers of all the children involved.

## **Pupils with Special Educational Needs and Disabilities**

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

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

Pupils with SEND are less able to protect themselves from abusers; if a Pupil with SEND experiences difficulties, they may feel they have no one to confide in. Other reasons why Pupils with SEND can be more at risk include the following:

- They may be afraid to confide in someone.
- They have an increased risk of being bullied.
- Some pupils with SEND rely on adults for everything, including personal care, and this vulnerability puts them at a greater risk of being harmed or abused.
- If they have been harmed before they may not want to speak out again in fear of being disbelieved or blamed.
- Staff may not be able to spot the signs of abuse in children with SEND.

To address these additional challenges, pupils with SEND may require extra pastoral support. The additional vulnerabilities of pupils with SEND and the school's duty to make reasonable adjustments should be particularly carefully considered in situations where the use of reasonable force may be needed in response to risks presented by incidents involving children with SEND or medical conditions.

## **Pupils with a Social Worker**

Pupils may need a social worker due to safeguarding or welfare needs. Pupils may need this help due to abuse, neglect and complex family circumstances. We recognise that 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.

The Local Authority will share the fact a Pupil has a social worker and the DSL and all members of staff will work with and support social workers to ensure any decisions are made in the best interests of the Pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

## Looked-After and Previously Looked-After Children

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

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

We have appointed a designated teacher, **Mrs Zoe Adams, Deputy Headteacher**, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

As part of their role, the designated teacher will:

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

## Mobile Phones and Cameras

The academy recognises that personal communication through mobile technologies is an accepted part of everyday life for pupils, staff and parents/carers, but technologies need to be used safely and appropriately within school and in accordance with the law and other appropriate school policies:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.
- Staff will not use personal phones to make contact with children or parents/carers.
- Staff are not permitted to use recording equipment on their mobile phones, for example: to take recordings of pupils, or sharing images. Legitimate recordings and photographs should be captured using school equipment such as cameras, iPad or school phone. We will follow the [General Data Protection Regulation](#) and [Data Protection Act 2018](#) when taking and storing photos and recordings for use in the school.

We will follow the advice of [Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings](#). This means that staff should turn off 3G/4G/5G data access at all times when on school premises. Staff are also advised that the

Bluetooth communication or similar function of a mobile phone (such as 'airdrop') should also be 'hidden' or switched off at all times when on school premises.

### Staff Misuse

Staff should report any usage of mobile devices that causes them concern to the Headteacher. Any complaint about staff misuse will be dealt with in accordance with the schools Disciplinary Policy.

## Complaints and Concerns about School Safeguarding Policies

### Complaints Against Staff

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

### Other Complaints

If concerns are raised by parents/carers that relate to a possible safeguarding issue, the matter will be referred to the designated safeguarding lead or the senior leadership team and will be handled in line with the Child Protection and Safeguarding Policy. If the concerns related to the premises, the Headteacher would work collaboratively with the operations team to investigate the concerns further and take action if required.

### Whistle-blowing

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

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 senior leadership team.

Where a staff member feels unable to raise an issue, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#)
- the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school. Staff can call the NSPCC Whistleblowing Advice Line on 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### Record-keeping

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

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

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

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

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

We will hold records in line with our records retention schedule and [GDPR](#). The academy will share information with other agencies and when this is appropriate, in line with local safeguarding procedures.

In addition:

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

## Training

### All Staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

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

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

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

Volunteers will receive appropriate training, if applicable.

### The DSL and Deputy/Deputies

The DSL and Deputy/Deputies will undertake child protection and safeguarding training at least every 2 years.

The DSL should also complete the 'Core Working Together' and 'Threshold' training.

The DSL will facilitate formal supervision of all Deputy DSL's each school term or as required.

The Senior Inclusion Manager and Safeguarding Lead will facilitate supervision of the DSL each school term or as required.

The Senior Inclusion Manager and safeguarding Lead will be available to provide support with any complex cases.

The DSL will produce a whole school safeguarding calendar for the academic year. This will be subject to change if new Policies, procedures or guidelines are issued at Local or National levels.

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

They will also undertake Prevent awareness training.

### **Local Advisory Committee**

All members receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

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

A member of the local advisory committee will take a lead on Safeguarding. Additional training will be provided as required. The named LAC member will meet with the DSL on a half termly basis to check this policy is being carried out in practice. The visit will include checking the current status of the school Single Central Register.

### **Recruitment – Interview Panels**

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, [Keeping Children Safe in Education \(2020\)](#), and will be in line with local safeguarding procedures.

### **Staff Who Have Contact with Pupils and Families**

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

### **Monitoring Arrangements**

This policy will be reviewed annually (or before if significant changes are made to statutory frameworks). At every review, it will be approved by the Board of Trustees.

### **Links with other policies**

This policy links to the following policies and procedures:

- Behaviour.
- Disciplinary.
- Complaints.
- Health and safety.
- Attendance.
- Online safety.
- Equality.
- Relationship education (RHE)
- First aid.
- Curriculum.
- Designated teacher for looked-after and previously looked-after children.
- Privacy notices.

**The following appendices are based on the Department for Education’s statutory guidance, [Keeping Children Safe in Education \(2020\)](#).**

## Appendix I: Types of Abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

**Peer on Peer Abuse** occurs when children are exploited, bullied and/or harmed by other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying).
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Bullying (including cyberbullying).
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence, such as rape, assault by penetration and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Upskirting. [The Voyeurism \(Offences\) Act 2019 \(“upskirting”\)](#), typically involves someone taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.
- Sexting (also known as youth produced sexual imagery).
- Initiation/hazing type violence and rituals.

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

These are the types of checks available to those working with children:

Type Of Check	What The Check Involves	Positions Eligible For This Level Of Check
<b>Standard check</b>	Check of the Police National Computer records of convictions, cautions, reprimands and warnings.	The position being applied for must be covered by an exempted question in the <a href="#">Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975</a> .
<b>Enhanced check</b>	Check of the Police National Computer records <b>plus</b> additional information held by police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed.	The position being applied for must be covered by an exempted question in the <a href="#">Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975</a> and by provisions in the <a href="#">Police Act 1997 (Criminal Records) Regulations 2002</a> .
<b>Enhanced criminal record check with children’s and/or adult’s barred list information</b>	Check of the Police National Computer records <b>plus</b> additional information held by police <b>plus</b> check of the DBS Children’s Barred List <b>plus</b> check of the DBS Adults’ Barred List.	The position must be eligible for an enhanced level criminal record check as above and be for a purpose listed in the <a href="#">Police Act 1997 (Criminal Records) (No2) Regulations 2009</a> as qualifying for a barred list(s) check.

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

### New Staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

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

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

### **Existing Staff**

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

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

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the

[Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

**This is a legal duty and failure to refer when the criteria are met is a criminal offence.**

### Agency and Third-Party Staff

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

### Contractors

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

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

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

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

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

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

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

### Trainee/Student Teachers

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

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

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

## Volunteers

We will:

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

## Trustees/Local Advisory Committee Members

All trustees and members will have an enhanced DBS check without barred list information.

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

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

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

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity.
- Right to work in the UK.
- Other checks deemed necessary if they have lived or worked outside the UK.

Using the free Employer Secure Access sign-in portal via the Teaching Regulation Agency's (TRA) [Teacher Services web page](#), schools can easily check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction.

## Associate Members

Associate members are appointed by the governing body to serve on one or more governing body committees. [The School Governance \(Constitution and Federations\) \(England\) \(Amendment\) Regulations 2016](#) made enhanced DBS check mandatory for maintained school governors but not associate members.

## Staff Working in Alternative Provision Settings

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

## Appendix 3: Allegations of Abuse Made Against Staff

This section of this policy applies to all cases in which it is alleged that a current member of staff (including teachers, supply teachers, other staff, volunteers and contractors) 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 he or she would pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

### Suspension of the Accused Until the Case Is Resolved

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

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

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

### Definitions for Outcomes of Allegation Investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for Dealing with Allegations

In the event of an allegation that meets the criteria above, the Headteacher (or chair of the board where the Headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the Local Authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

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

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

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

## Timescales

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

## Specific Actions

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

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

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

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's Human Resources adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

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

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

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

### **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the Headteacher, or other appropriate person in the case of an allegation against the Headteacher, will consider whether any disciplinary action is appropriate against the Pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a Pupil.

## Confidentiality

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

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

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

## Record-keeping

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

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual.

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

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

## References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

## Learning Lessons

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

This will include consideration of (as applicable):

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

## **Appendix 4 – Specific Safeguarding Issues**

### **Children Missing from Education**

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

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

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

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

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

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

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

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. 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. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range

from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. For example, young people may be coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections or becoming pregnant.
- Displaying inappropriate sexualised behaviour.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and/or alcohol.
- Going missing for periods of time, or regularly coming home late.
- Regularly missing school or education, or not taking part in education.

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

If a child is thought to be at risk or discloses they are suffering Sexual Exploitation, the DSL will follow the [Section 47](#) referral as described above. The DSL will also complete a Child Sexual Exploitation Screening Tool and a Police referral, sending them all to the MASH.

## Domestic Abuse

Domestic violence and 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.

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a

child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

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

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

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

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

- [NSPCC- UK domestic-abuse Signs Symptoms Effects.](#)
- [Refuge what is domestic violence/effects of domestic violence on children.](#)
- [SafeLives: young people and domestic abuse.](#)
- [Black Country Women's Aid.](#)

## Homelessness

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

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

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

## Mental Health

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.

The department has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol.

## So-Called 'Honour-Based' Abuse (Including FGM and Forced Marriage)

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

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

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

If there are concerns or a child makes a disclosure of Forced Marriage or Honour Based Abuse, staff will inform the DSL. The DSL will follow [Section 47](#) referral through a MARF and if needed contact the Forced Marriage Unit for further advice.

## FGM

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

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

Indicators that FGM has already occurred include:

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

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable

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

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

- The girl’s family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl’s community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

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

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

## Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form

of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

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

## Preventing Radicalisation

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

**Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Terrorism** is an action that:

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

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a Pupil, they will follow our procedures set out in '[Concerns About a Child](#)' section of this policy, including discussing their concerns with the DSL. Staff must always take action if they are worried.

If there are concerns about a child being radicalised under the [Prevent Duty \(2015\)](#) or they disclose extremist ideology and views, then the DSL will make a referral completing a MARF and a Prevent Referral for Channel. Awareness of the Far-Right movement within the local area will be closely monitored. Parents/Carers will only be notified if instructed by MASH or Prevent staff.

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

## Self-Harm and Mental Health

Although this area is of paramount importance, it is not supported by Children's Services as significant harm. Children thought to be suffering poor mental health or disclose self-harm will be referred to the parent/carer to take to the family GP. The GP will assess the medical needs and refer as required.

CAMHS referrals can only be made via GP or hospital referral. The DSL will advise parents/carers on procedures to follow if they are concerned at home, this may include attending the local A&E or even phoning 999 in cases of emergency. If a parent/carer fails to seek medical help for their child, consideration will be given to possible Neglect and a [Section 47 referral](#).

We will follow the advice of [Mental Health and Behaviour in Schools November 2018](#) to support pupils whose mental health problems manifest themselves in behaviour. We will promote the welfare of our pupils which includes preventing impairment of children's health or development and taking action to enable all children to have the best outcomes. Full details are set out in [Keeping Children Safe in Education \(KCSIE\) statutory guidance \(2020\)](#).

## Harmful Sexual Behaviour

If staff are concerned about the sexualised behaviour of a child, they will report it to the DSL using the internal reporting system. If a MARF is to be completed, it will be sent with the completed risk assessment. Parents/carers will be notified unless it would place the child at greater risk or if instructed not to do so by the MASH Team.

## 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. Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#).

If a child is suspected to be at risk of or involved in county lines, or a child discloses Criminal Exploitation, 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. The matter will be referred to the MASH to establish Threshold levels. It

will usually require a referral to the Early Help Team at Youth Offending Services, however, this will rely on parental consent being obtained. If consent is refused, then a MARF will be completed and sent to Children's Services.

## Looked After Children and Previously Looked After Children

We will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after, or have been looked after by the Local Authority.

## Private Fostering

Private fostering is an arrangement made privately (i.e. not involving the Local Authority). A private foster carer is someone other than a parent or close relative that takes on the day-to-day care of a child. The parent retains overall responsibility for the welfare of the child. It is an arrangement that lasts for a period of 28 days or more in agreement with the child's parent. Private fostering applies to a child under the age of 16, or under 18, if disabled.

Any child living with an adult that is **NOT** a parent, grandparent, brother, sister, uncle or aunt for a period of more than 28 days will be classed as being Privately Fostered and reported to the Local Authority. This is in line with [Section 44 of the Children Act 2004](#).

## Young Carer

Any child that is caring for another family member who has a long term illness. The care provided can be physical or emotional support. It includes;

- Physical disability.
- Mental Disability.
- A long-term life limiting illness.
- Problems with mental Health.
- Alcohol or drug abuse related problems.
- Age related frailty.

## Non-collection of Pupils

If a child is not collected at the end of the session/day, we will ensure that the child receives a high standard of care in order to cause as little distress as possible.

Parents/carers of children starting at the setting are asked to provide the following specific information which is recorded on our Registration Form:

- Names, addresses, telephone numbers of adults who are authorised by the parents/carers to collect their child from the setting, for example a childminder or grandparent.
- Any person who has parental responsibility for the child.
- Information about any person who does not have legal access to the child.

On occasions when parents/carers are aware that they will not be at home or in their usual place of work, they inform us of how they can be contacted.

On occasions when parents/carer or the persons normally authorised to collect the child are not able to collect the child, they provide us with written details of the name, address

and telephone number of the person who will be collecting their child. We agree with parents/carers how to verify the identity of the person who is to collect their child.

Parents/carers are informed that if they are not able to collect the child as planned, they must inform us so that we can begin to take back-up measures. We provide parents/carers with our contact telephone number.

We inform parents/carers that we apply our child protection procedures as set out in our child protection and safeguarding policy in the event that their children are not collected from setting by an authorised adult within one hour after the setting has closed and the staff can no longer supervise the child on our premises.

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

- The child's file is checked for any information about changes to the normal collection routines.
- If no information is available, parents/carers are contacted.
- If this is unsuccessful, the adults who are authorised by the parents/carers to collect their child from the setting – and whose telephone numbers are recorded on the Registration Form – are contacted.
- All reasonable attempts are made to contact the parents/carers or nominated carers.
- The child does not leave the premises with anyone other than those named on the Registration Form or in their file.
- If no one collects the child after one hour and there is no-one who can be contacted to collect the child, we apply the procedures for uncollected children.
- We contact our local authority children's **Social Care Team**.
- Out of hours' duty officer **0300 555 2922**.
- The child stays at setting in the care of two fully-vetted workers until the child is safely collected either by the parents/carers or by a social care worker.
- Social Care will aim to find the parent/carer or relative if they are unable to do so, the child will become looked after by the local authority.
- Under no circumstances do staff go to look for the parent/carer, nor do they take the child home with them.
- A full written report of the incident is recorded on the child's Chronological report.
- Depending on circumstances, we reserve the right to charge parents/carers for the additional hours worked by our staff.
- Ofsted may be informed: **03001231231**.
- Parents/carers attending any groups, sessions or drop-ins within the organisation are responsible for their own children at all times.

## Missing Pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect;
- Come from Gypsy, Roma, or Traveller families;
- Come from the families of service personnel;
- Go missing or run away from home or care;
- Are supervised by the youth justice system; come from new migrant families

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

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

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