



The Maria Montessori Training Organisation  
trading as  
Maria Montessori Institute

**Safeguarding and Child Protection Policy**

<b>Approved by</b>	<b>MMI Board of Directors</b>	<b>Date</b>	<b>October</b>	<b>2020</b>
<b>Next review due</b>		<b>Date</b>	<b>September</b>	<b>2021</b>

**Introduction**

The health, safety, and wellbeing of all our children are of paramount importance to all the adults who work at the Maria Montessori School. The children have the right to protection, regardless of age, gender, religion, race, culture, ability, or disability. They have a right to be safe in our school, to feel valued and confident, knowing how to approach adults if they are in difficulty. Our *Safeguarding Policy* is used in parallel with our *Behaviour Policy and Anti-Bullying Policy*. We will work with the family first, but should any concern come to light we will seek outside help from Children's Social Services if we consider there is any risk to the child's wellbeing. Our teachers and other staff (including voluntary and supply) are aware of the potential scope for problems relating to mental health, physical health, child criminal exploitation, child sexual exploitation, County Lines, domestic abuse, honour based abuse, preventing radicalisation, FGM, hazing, upskirting, sexting and online safety. We are also aware that Relationship Education and Health Education are mandatory in Primary schools and realise the importance of both and their crucial contribution in creating the citizens of the future.

This policy provides staff, supply, volunteers and the senior management, together with the Board of Trustees, with the guidance they need in order to keep children safe and secure in our school and inform parents and guardians how we will safeguard their children whilst they are in our care. Our school promotes safe practice and professional conduct to safeguard children and mitigate against the potential for misunderstandings or situations being misconstrued so that teachers and other staff are not vulnerable to allegations. Our staff maintain an attitude of 'it could happen here' as far as safeguarding is concerned. We understand the importance of children receiving the right help at the right time to address risks and prevent issues escalating. We are also aware that no single practitioner can have a full picture of a child's needs and circumstances. One person might teach them all day but someone else might notice something at lunch time, in the playground, in the toilets, at sport or on an outing. We are duty bound for the sake of the child to share any information, however trivial it might seem at the time, as it really might be the last piece of the jigsaw puzzle that was previously missing.

In our school we respect our children. The atmosphere within the school is one that encourages all children to do their best. We provide opportunities that enable them to take and make decisions for themselves. The teaching of personal, social and health education and what it means to be a responsible citizen is embedded in our approach and helps to develop appropriate attitudes in the children and makes them aware of the impact of their decisions on others. We also teach them how to recognise right from wrong as well as seeing different risks in different situations, and how to behave in response to them.

Safeguarding is everyone's responsibility. All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and the



procedures both within and outside of normal school hours, including activities away from school. All employees, supply, volunteers and contractors are required to sign that they have read, understood and will abide by our **Safeguarding and Child Protection Policy; Part One and Annex A (pages 82-96 inclusive) of Keeping Children Safe in Education (September 2020)**. Staff will also sign that they have read our *Staff Code of Conduct, the Behaviour Policy, Bullying Policy, and our Safeguarding Response to children who go Missing from Education as well as the Whistle Blowing Policy*.

Our amended *Safeguarding Policy* takes into account that safeguarding has to be a child centred approach and that promoting the welfare of children is everyone's responsibility. Everyone that comes in to contact with children and their families has a role to play. In order to fulfil this responsibility our approach must be child centred or, being able to consider at all times what is in the best interest of the child. Together we must protect children from maltreatment; prevent impairment of children's mental and physical health or development; ensure that children grow up in circumstances consistent with the provision of safe and effective care; and take action to enable all children to have the best outcomes. All staff should be prepared to identify children who might benefit from early help and any staff member, supply or volunteer who has a concern should follow the concern process.

The three overarching principles to our *Safeguarding Policy* are:

**PREVENTION:** We safeguard children whatever the risk and do not allow apprehensions to stand in the way of early help for the child. We follow safer recruitment procedures to ascertain the suitability of staff, supply and volunteers and have a robust Induction procedure to make all staff aware of the signs to look for as well as the process to follow. We work with other agencies to reduce risks and keep records of the slightest concern that may become an important part in a larger picture. Staff are alert to changes in behaviour, academic progress, or unhappiness, allowing for early help either through the school's pastoral services or through social services under the 'Child in Need' provision.

**PROTECTION:** Staff are trained and supported to respond appropriately and sensitively to all safeguarding concerns following our agreed procedures. We identify and act on early signs of abuse, neglect as well as both physical and mental health; reassessing where concerns or situations do not improve and may require the right to seek outside help at the right time to prevent escalation. We ensure that allegations, concerns, suspicions, and complaints against staff are dealt with promptly and in accordance with DfE and Local Borough guidance. We keep accurate records and share relevant information as requested above and beyond GDPR guidance. Additionally, we take all steps to ensure that our premises are as secure as circumstances permit.

**SUPPORT:** We support children who may be at risk of significant harm, abuse, neglect or who may have emotional or mental difficulties either in accordance with their child protection plan or, at the first signs, through a robust school plan of detailed observation, Grace & Courtesy groups, good role models, books and pastoral care for the child and, or, the parents. We provide a safe and positive school environment with firm and clear boundaries enabling a calm and gentle atmosphere in which children can flourish. We are aware that children cannot learn effectively unless conditions are suitable for them. Additionally, we operate good and sensible Health & Safety procedures along with clear and supportive policies on drug, alcohol, and substance misuse. We are aware of the government guidelines on Transferable Risks.



We are aware that the Department of Education issued non-statutory interim guidance on safeguarding in schools during the coronavirus outbreak which we adhered to. This guidance has now been withdrawn as all schools are returned in line with government expectations (September 2020). Requirements for local interventions in educational settings will continue to be reviewed and we will follow as required. Meanwhile, we will continue with ensuring a COVID safe environment as far as possible by following government guidelines on social distancing, emphasising cleanliness and frequent, thorough handwashing procedures as well as access to fresh air as much as possible.

This policy ensures that all staff in our school are clear about the actions necessary with regard to a child protection issue and has been developed in accordance with the principles established by the **Children Acts 1989 and 2004** and related guidance. See Appendix One for full details. This policy is one of a series in the school's integrated safeguarding portfolio.

This includes:

- Safer recruitment
- Anti-bullying Policy
- Children Missing in Education
- Mental health & Physical health
- Whistleblowing
- Collection of Children from School
- Use of Mobile Phones and Cameras
- Health and Safety
- Online Safety Policy
- Behaviour
- Staff behaviour/code of conduct
- Transferable Risks
- Complaints
- Attendance
- Equality
- Sex and relationship education
- First aid
- Curriculum

### **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).
- have disabilities and/or additional needs.
- are young carers.
- are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement.
- are frequently missing from school/ go missing from home.
- are at risk of modern slavery, trafficking, or exploitation.
- may experience discrimination due to their race, ethnicity, beliefs, 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 drug, alcohol and substance abuse or domestic violence/abuse and adult mental health issues.
- are misusing drugs or alcohol themselves.
- are privately fostered (more than 28 days in the care of a non-family member).
- are at risk of FGM, sexual exploitation, forced marriage, honour based abuse, County Lines 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.

Our policy applies to all staff, supply and volunteers working in the school. There are five main elements to our policy:

- ensuring we practise safe recruitment in checking the suitability of staff and volunteers to work with children.
- raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- supporting children that have been abused in accordance with his/her agreed child protection plan.
- establishing a safe environment in which children can learn and develop.

We recognise that because of the day-to-day contact with children, schools are well placed to observe the outward signs of abuse. The school will therefore:

- establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- ensure children know that there are adults in the school whom they can approach if they are worried.



- include opportunities for children to develop the skills they need to recognise and stay safe from abuse.

### **Roles and Responsibilities**

#### **Key personnel**

**The Chair of the Trustees/Board of Directors is Richard Partridge**

Contact details: email: [chairoftrustees@mariamontessori.org](mailto:chairoftrustees@mariamontessori.org) Tel: 020 7435 3646

**The Head of School (Acting) is Poinsy Pino**

Contact details: email: [poinsy.pino@mariamontessori.org](mailto:poinsy.pino@mariamontessori.org) Tel: 020 7435 3646

**The Designated Safeguarding Lead (DSL) is Karen Gelson**

Contact details: email: [karen.gelson@mariamontessori.org](mailto:karen.gelson@mariamontessori.org) Tel: 020 7435 3646  
(Out of school hours telephone contact is 07830391472)

**The Deputy Designated Lead (DDSL) is Jane Luetkens**

Contact details: email: [jane.luetkens@mariamontessori.org](mailto:jane.luetkens@mariamontessori.org) Tel: 020 7435 3646

**The Board Member with responsibility for safeguarding is Wendy Innes**

Contact details: email: [wendy.innes@mariamontessori.org](mailto:wendy.innes@mariamontessori.org) Tel: 020 7249 1450

**The Executive Director is Lynne Lawrence**

Contact details: email: [lynne.lawrence@mariamontessori.org](mailto:lynne.lawrence@mariamontessori.org) Tel: 020 7435 3646

**Given the extremely difficult circumstances that we currently find ourselves in, due to the pandemic, we have extended our Safeguarding Team to include the Head of School, Poinsy Pino, who completed her DSL training (September 21/22, 2020) so that there is a relevant person available at all times, whether one or the other of us is taking a class, covering off site or on a training course.**

#### **The Designated Safeguarding Lead**

- provides support to staff members to carry out their safeguarding duties.
- is appropriately trained, with updated training taken every two years.
- has a working knowledge of London Multi-Agency Safeguarding Hubs (MASH) procedures.
- keeps detailed written records of all concerns, ensuring that such records are stored securely.
- will co-ordinate action in school, refer, liaise with Social Care and other agencies over suspected or actual cases of child abuse.
- notifies Social Care if a child with a protection plan is absent for more than two days without explanation.



- ensures that the Safeguarding Policy is regularly reviewed in line with the latest guidance and updated and is made available publicly on the school website.
- ensures all staff who work with children receive appropriate training every three years, and in accordance with the requirements of the MASH.
- ensures cases concerning a member of staff are referred appropriately to the Local Authority Designated Officer (LADO) and/or the Disclosure and Barring Service (DBS).
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. An email should be sent, or phone call made outside of school hours.
- If a DSL is not available this should not delay appropriate action being taken by any member of staff though and anyone can make a referral. However, if this happens the DSL should be informed of actions that have been taken as soon as possible.

**The Deputy Designated person(s)** is appropriately trained and, in the absence of the Designated person, carries out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the Designated person, the deputy will assume all the functions above.

**The Board of Directors** ensures that the school:

- appoints a DSL for child protection who is a member of the senior leadership team. ensures that the DSL role is explicit in the role holder's job description.
- has a child protection policy and procedures, including a staff code of conduct, that are consistent with London Multi-Agency Safeguarding Hubs (MASH) and statutory requirements, reviewed annually and made available publicly on the school's website or by other means.
- the Board of Directors nominates a member to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Head of School or a member of the Board.
- it is the responsibility of the Board of Directors to ensure that the school's safeguarding, recruitment and managing allegations procedures are in accordance with the MASH and national guidance.

The Board of Directors delegates responsibility for the following to the Executive Director:

- ensuring procedures are in place for dealing with allegations of abuse made against members of staff including allegations made against the Head of School and allegations against other children,
- ensuring Safer Recruitment Procedures are followed that include statutory checks on staff suitability to work with children.



**The Executive Director** delegates responsibility for the following to the Head of School:

- developing a training strategy that ensures all staff receive information about the school's safeguarding arrangements on induction and appropriate Child Protection training, at least annually which is regularly updated in line with any requirements of the Local MASH. The DSL receives refresher training at two-yearly intervals.
- ensuring that all temporary staff are checked under Safer Recruitment Procedures and both they and volunteers are made aware of the school's arrangements for child protection.
- ensuring that the school contributes to multi-inter- agency working and plans.
- consideration of how children may be taught about safeguarding, including online safety as part of a broad and balanced curriculum.

**The Head of School:**

- ensures that the Child Protection Policy and Procedures are implemented and followed by all staff.
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the Whistle Blowing Procedures.
- ensures that children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- ensures that any member of staff who is dismissed or resigns following an allegation made against them is referred to the Disclosure and Barring Service.
- ensures that the DSL has appropriate time, funding, training, regular formal supervision, and resources, and that there is always adequate cover if the DSL is absent.
- ensures that all staff undertake appropriate safeguarding and child protection training and updates this regularly.
- ensures the relevant staffing ratios are met, where applicable.
- ensures each child in the Early Years Foundation Stage is assigned a key person.

**The Designated Safeguarding Lead (DSL)**

- The DSL is the central contact point for all staff to discuss any safeguarding concerns and has lead responsibility for managing child protection referrals, safeguarding training, and raising awareness of all child protection policies and procedures. They are expected to have a complete safeguarding picture. They will ensure that everyone in school (including temporary staff, volunteers, and contractors) is aware of this policy and our procedures and that they are followed at all times.



- The DSL maintains a confidential recording system for all Safeguarding and Child Protection concerns and works closely with the Designated Teacher for CLA and the Head of the Virtual School for all children who are looked after or have previously been looked after.
- The DSL ensures that the school provides reports/updates and is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences and Team around the Child Meetings).
- During term time the Designated Safeguarding Lead (or a deputy) will always be available (during normal school hours) for staff in school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, in *exceptional circumstances* availability via phone and or Skype or other such mediums is acceptable.

### Early Help

Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs.
- has special educational needs (whether or not they have a statutory education, health and care plan).
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from care or from home.
- is misusing drugs or alcohol themselves.
- Is at risk of modern slavery, trafficking, or exploitation.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- has returned home to their family from care.
- is showing early signs of abuse and/or neglect.
- is at risk of being radicalised or exploited either CCE or CSE.
- is a privately fostered child.

All staff are aware of the Early Help process and understand their role within it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

If Early Help is assessed to be appropriate, then the DSL will support staff members involved with the family to initiate an Early Help Assessment or request targeted family support, e.g. Families First.





The DSL will keep all Early Help cases under constant review and will give consideration to making a Child in Need or Child Protection referral if the situation doesn't appear to be improving for the child. Relevant contact details are:

- Camden Early Help: 020 7974 3317 9-5pm. Email: [LBCMASHadmin@camden.gov.uk](mailto:LBCMASHadmin@camden.gov.uk)
- Islington Early Help: Children Services Contact Team: 020 7527 7400
- Kensington and Chelsea: 020 7598 4608
- Westminster: Access and Assessment Service: 020 7641 4000
- Haringey: Children's Services: 0208 489 0000
- Barnet: Children's Services: 0208 359 4066 out of hours: 0208 359 2000

## Safeguarding

### The definition of Safeguarding is:

- protecting children from maltreatment.
- preventing impairment of children's health or development.
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best life chances.
- To summarise, keeping all children safe and protected from any kind of harm, either physical or mental, whilst on the premises of the Maria Montessori School and ensuring, as far as is possible through constant vigilance, that their lives outside of school are equally risk free.

### If you have concerns about a child's welfare

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

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

**Child Protection** is often used, mistakenly, synonymously with Safeguarding, but is a distinct and separate area whereby Safeguarding refers to all children and Child Protection refers distinctly to those children who are at risk of harm. Risk of harm may arise from a single event or a series of concerns over time. Protecting children from abuse, whether physical or mental, is crucial in that abuse of any kind will have a negative impact on a child's safety, well-being and development. We must respond quickly and appropriately to any Child Protection occurrence.

### Online Safety with respect to Safeguarding and Child Protection procedures

It is essential that children are safeguarded and protected from potentially harmful and inappropriate online material. As such governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place.



Use of technology has become a significant component of many safeguarding and child protection issues. Child sexual exploitation; child criminal exploitation; radicalisation; sexual predation- can be encountered through technology platforms that facilitate harm. An effective approach to online safety empowers a school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

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.
- **contact:** being subjected to harmful online interaction with other users.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

The school ensures that as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding and child protection approach.

#### **Procedure for reporting concerns**

Staff have an important role to play in recognition and referral. Any child in any family in any way could become a victim of abuse. Staff should always maintain an attitude of ‘it could happen here’.

- discuss any concerns you have with the DSL, including ‘low level’ concerns or ‘gut feelings’.
- make observations and record any evidence that you need in a written form.
- do not start your own investigation.
- teachers and staff will report concerns to Lead Teachers, who will in turn report to the DSL.
- the DSL will contact Children’s Social Care for advice or make a referral if it is believed that a child is suffering or is at risk of suffering significant harm. Children’s Social Care will determine whether a concern regarding a child reaches the social care/child protection threshold and 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 will press for reconsideration to ensure that the child’s situation improves.
- no matter how positive the school’s relationship with family, the welfare of the child is paramount.



- *Keeping Children Safe in Education (September 2020)* emphasises that any member of staff can contact Children’s Social Care if they are concerned about a child. Tell the DSL as soon as possible if you make a referral directly.

## **Disclosures**

### **Keeping yourself safe when responding to disclosures (the 6 R’s – what to do if...)**

#### **1. Receive**

- Keep calm.
- Listen to what is being said without displaying shock or disbelief.
- Take what is being said to you seriously.

#### **2. Respond**

- Reassure the child that they have done the right thing in talking to you.
- Be honest and do not make promises you cannot keep e.g. “It will be alright now”
- Do not promise confidentiality; you have a duty to refer
- Reassure and alleviate guilt if the child refers to it e.g. “you’re not to blame”
- Reassure the child that information will only be shared with those who need to know.

#### **3. React**

- React to the child only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details.
- Do not ask leading questions; “Did they...?” Such questions can invalidate evidence.
- Do ask open “TED” questions; Tell, explain, describe
- Do not criticise the perpetrator; the child may have affection for them.
- Do not ask the child to repeat it all for another member of staff.
- Explain what you have to do next and who you have to talk to.

#### **4. Record**

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible.
- Do not destroy your original notes.
- Record the date, time, place, any non-verbal behaviour, and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions.

#### **5. Remember**

- Contact the Designated Safeguarding Lead (DSL).
- The DSL may be required to make appropriate records available to other agencies.



## 6. Relax

- Get some support for yourself, dealing with disclosures can be traumatic for professionals.

### **Notifying parents**

- The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.
- However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.
- In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

### **Confidentiality and sharing information**

All staff will understand that Child Protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence. However, KCSiE 2020 emphasises that knowledge should be shared wherever possible in order to help the child.

(Staff should discuss concerns with the DSL, Executive Director, or the Nominated Board Trustee. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis. There is less emphasis on this now in KCSiE 2020.)

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.

Records are maintained in both paper and electronic format. Any paper-based records that are kept off site are stored in a locked facility until they can be transferred to the Head Office at Hampstead which should be done as soon as is practicable. Paper based records in Hampstead are kept in a locked cupboard in the office of the Executive Director and only the DSL has access. Electronic records are kept on a confidential part of the server and only the DSL and Executive Director have access.

Every effort will be made to prevent unauthorised access, and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage. Child protection information will be stored separately from the child's school file and the school file will be 'tagged' to indicate that separate information is held.

The data retention policy identifies appropriate retention timescales:

- 25 years from the date of birth if there are low level concerns with no multi-agency plan.



- If a referral has been made and social care has been involved and the child has been the subject of a multi-agency plan – indefinitely.

Child protection information will be stored and handled in line with GDPR 2018 principles. Staff should 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 in the sections on sharing information and record-keeping and allegations of abuse against staff.

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 child 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.

Information will be shared with other agencies using their encrypted email facilities such as [www.egress.com](http://www.egress.com)

### **Disciplinary action**

- In the case of an allegation against a staff member, the circumstances of the allegation will be assessed, the safety of the child/children will be assessed, and a decision made as to whether or not that member will be suspended pending an investigation (see Disciplinary Procedure).
- Where a member of staff or a volunteer is dismissed from the setting or internally disciplined because of misconduct relating to a child, notify the Disclosure Barring Service (DBS).



- The senior staff member will gather all evidence from all parties involved that will then be supplied to the Steering Committee within seven days and appropriate action will be taken and authorities informed if necessary.

### **Training**

All staff members, supply and volunteers 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, at least annually 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.

### **The DSL and deputies**

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake Prevent awareness training.

### **Directors**

The Director responsible for Safeguarding receives training about Safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the Director of the Board 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.

### **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, and will be in line with local safeguarding procedures.



### **Staff who have contact with children and families**

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

All staff members must be aware of systems within their school which support safeguarding and these will be explained to them as part of staff induction. This will include:

- the Child Protection Policy.
- the Behaviour Policy for Children
- the Anti-bullying Policy
- the Staff Behaviour Policy (sometimes called a Code of Conduct); and
- the role of the Designated Safeguarding Lead. Copies of policies and a copy of Part One of this document (Keeping Children Safe in Education 2020) should be provided to staff at induction together with a copy of Annex A

### **Recognising Abuse**

All school staff are aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

**There are four categories of abuse: physical abuse, emotional abuse, sexual abuse, and neglect.**

**Abuse is** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online; texting or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

- **Physical abuse**  
Physical abuse is a form of abuse which may involve hitting, pulling hair, 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. (This used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as Fabricated or Induced Illness).
- **Emotional abuse**  
Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It



may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **Sexual abuse**

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 someone and touching the outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, sexting and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education

- **Neglect**

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 caregivers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Definitions taken from *Keeping Children Safe in Education* (DfE, 2020)

## **Bullying**

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





All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures. Prejudice-based bullying is defined as any type of direct physical or verbal bullying, indirect bullying or cyber bullying based on protected characteristics such as: age, ability, disability, gender reassignment, race, sex, sexual orientation, religion, belief or lack of belief/religion. Parents can access the policy on the school website and the subject of bullying is addressed at regular intervals through the curriculum.

If the bullying is particularly serious, or the tackling bullying procedures are deemed to be ineffective, the head teacher and the DSL will consider implementing child protection procedures.

### **Domestic Abuse**

Domestic abuse is the physical, emotional, psychological, or sexual violence, or threat of violence usually directed against women by men in a domestic situation. Children and young people may witness this as well as get caught up in it. They are particularly likely to be affected emotionally which may impact on their relationships, behaviour, and achievement in school. They may tell someone at school when things get really bad. Domestic violence is contained in the definition of emotional abuse. It is known to link to physical and/or sexual abuse and must be taken seriously.

Members of staff need to refer these concerns to the Designated teacher who can refer the matter to Children's Social Care when there are grounds for believing the child/young person may be suffering from significant harm. It will be important to keep confidentiality in these cases and the parents' and child's address should not be given to anyone else unless this has been checked for their continuing safety.

#### **Signs:**

- Abnormal growth and development
- General appearance
- Eating problems
- Attendance
- Physical changes
- Behaviour changes
- Bruising, cuts, burns, bites
- Relationship with parents, carers
- Child's own statement
- Statement made by third party

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

We recognise that children 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.
- Children being more prone to peer group isolation than other children.



- The potential for children 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.

In order to safeguard children with more complex needs, staff in school will work especially hard to develop the skills they need to give them a 'voice'. In practice, three essential questions always need to be asked:

- What is expected of this child? - Developmentally, behaviourally etc.
- Do I / we understand how any condition, disability, impairment, or other factor e.g. culture impacts?
- How well can I / we understand and communicate with this child?

National guidance makes it clear that for some children it is not yet possible to prescribe techniques for communicating about possible abusive experiences in ways which are reliable and evidentially safe. Spontaneous disclosures are rare from disabled children, especially those who use alternative or augmentative communication systems and abuse is more likely to be identified via physical signs, behavioural responses and /or emotional presentation / changes. It is therefore imperative that staff are sensitive to what might be very subtle indicators, especially where children have multiple disabilities, and that there is regular consultation occurs between the teachers and DSL in school, especially in circumstances where issues and / or concerns arise.

**Operation Encompass** operates in the majority of police forces across England and helps schools and police to work together to provide emotional and practical help to children. This 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 DSL, in school before the child arrives at school the following day.

**National Domestic Abuse Helpline** which can be called in confidence 24 hours a day, free of charge, on **0808 2000 247**

### **Child Missing from Education**

All staff must be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's Unauthorised Absences and Children Missing from Education procedures. All staff must follow up a child's absence by either checking with the Head Office if there have been any messages regarding a child's absence and, if not, follow up with a telephone call to the family enquiring about the child's absence on any particular day. This is in line with the best practice possible.

The risks associated with a child going missing from education are given more prominence in ***Keeping Children Safe in Education 2020***.



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, County Lines, or issues such as mental health problems, substance abuse, radicalisation, FGM, honour-based abuse, 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 Traveler 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 as well as criminal 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.

Staff must report to the DSL any regular pattern of absences. The DSL will report to the Local Authority in the following circumstances:

- 10 days of unauthorised absence, other than for reasons of sickness or leave of absence.
- failure to attend regularly.
- where a child has been taken out of school to be home educated.
- where a family has moved away.
- where a child has been certified medically unfit to attend.
- where a child has been permanently excluded.

The duty arises as soon as the above grounds are met and, in any event, before deleting a child's name from the register. Where a child is leaving the school and the next school is not known, this will also be reported to the Local Authority in which the child lives.



## Child Sexual Exploitation

Child Sexual Exploitation (**CSE**) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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.

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.

## Female Genital Mutilation (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.

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'.

## Mandatory Reporting Duty

**Any member of staff** who suspects a child is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and inform Children's Social Care. Teachers must personally report to the police (by ringing 101) cases where they discover that an act of FGM appears to have been carried out. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.



They should also still consider and discuss any such case with the DSL and involve children's social care as appropriate. The duty to contact the police does not apply in relation to at risk or suspected cases.

Indicators that FGM has already occurred include:

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

Possible indicators that a child has already been subjected to FGM, and factors that suggest a child may be at risk:

- 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 child may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced 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.

### **Breast Ironing (also known as Breast Flattening)**

Breast Ironing is the process during which young pubescent girls’ breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely.

Breast ironing can begin as early as nine years old and has been documented primarily in Cameroon but is also practised in Benin, Chad, Ivory Coast, Guinea-Bissau, Togo, Kenya, Zimbabwe and South Africa. According to UN figures Breast Ironing affects 3.8 million women worldwide.

### **Honour Based Abuse**

So-called ‘Honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing/breast flattening. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the Designated Safeguarding Lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### **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 child is being forced into marriage, they will speak to the child about their concerns in a secure and private place. They will then report this to the DSL.



The DSL will:

- speak to the child 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 (LADO).
- seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmufco.gov.uk](mailto:fmufco.gov.uk)
- refer the child to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

The Forced Marriage Unit has published [Multi-agency guidelines](#), with pages 32-36 focusing on the role of schools and colleges. Staff should report concerns regarding forced marriage to the DSL or can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmufco.gov.uk](mailto:fmufco.gov.uk)

### **Abuse Linked to Faith or Belief**

Abuse linked with belief is where concerns for a child's welfare have been identified and a belief in witchcraft, spirit or demonic possession, ritual, or satanic abuse features, or when practice linked to faith or belief are harmful.

Globally, beliefs in the spiritual realm and malevolent forces are common. There is nothing wrong with these beliefs but what is unacceptable is any abuse that takes place against those that are branded/labelled either as a witch or as having been possessed by an evil spirit.

Significant harm (including murder) can occur because of concerted efforts to 'excise' or 'deliver' evil from a child (or vulnerable adult).

Children believed to be possessed and/or accused of witchcraft have been subjected to serious levels of abuse which can include:

- Physical abuse: beating, shaking, burning, cutting, stabbing, semi-strangulation, tying up, rubbing chilli peppers or other substances into genitals, eyes, or mouth.
- Emotional/Psychological Abuse: enforced isolation, threats of abandonment, convincing a child that they are evil or are possessed.
- Neglect: failure to provide appropriate medical care, hygiene, nourishment, clothing, or warmth; or to ensure sufficient supervision or school attendance.
- Sexual Abuse: children may be particularly vulnerable to sexual exploitation and may feel powerless or worthless and that they will not be believed.

The NSPCC have a dedicated helpline for Child Abuse linked to Faith or Belief. Phone 0800 028 3550 or by email: [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

### **Upskirting**

Upskirting is where someone takes 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 to obtain sexual gratification, or cause the victim humiliation, distress or alarm. This has now been made a criminal offence. (The Voyeurism Offences Act) 12<sup>th</sup> April 2019.



## Hazing

Initiation or ritual type of violence in which the victim may appear to have consented to undergo a particular ritual in order to 'belong' to a group of people, but this can cause lasting damage either mentally or physically.

## Peer on peer abuse/child on child

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 (i.e. that it was previously thought more likely that girls will be victims and boys the perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of children hurting other children 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 children in the school at risk.
- bullying (including online bullying, cyberbullying, prejudice-based bullying)
- is violent.
- involves children being forced to use drugs or alcohol.
- involves sexual exploitation, criminal exploitation, sexual violence, sexual abuse or sexual harassment such as sexual comments, remarks, jokes also online harassment,
- indecent exposure, sexual assault, upskirting, or sexually inappropriate pictures or videos (including sexting).
- initiation or hazing - ceremonies or types of rituals that cause a victim, willing or not, embarrassment, ridicule and risks emotional and /or physical harm.

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

- 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 do not tolerate any harmful behaviour in school and will take swift action to intervene where this occurs. We use lessons to help children understand, in an age-appropriate way, what abuse is, and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. All staff should be aware of the school's policy on peer abuse/bullying.





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 children across all genders – for example, sexualised or aggressive touching or grabbing towards any child, and initiation or hazing type violence with respect to all children.
- ensuring our curriculum helps to educate children about appropriate behaviour and consent.
- ensuring children know they can talk to staff confidentially.
- ensuring staff are trained to understand that a child 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**

### **Your responsibilities when responding to an incident**

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

You must **not**:

- View, download or share the imagery yourself, or ask a child 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 child to delete it.
- Ask the child(ren) 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 child(ren) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You must explain that you need to report the incident and reassure the child(ren) 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 children.
- 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 children 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 children involved (in most cases parents 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 child 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 child or young person's developmental stage or are violent.
- the imagery involves sexual acts and any child in the imagery is under 13.
- the DSL has reason to believe a child 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 children involved (if appropriate) to establish the facts and assess the risks.

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

### **Informing parents**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through local neighbourhood police, the safer school's officer or by calling 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 Confidentiality and Sharing Information section of this policy also apply to recording incidents of sexting.

## Curriculum Coverage

Children are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive.
- Issues of legality.
- The risk of damage to people's feelings and reputation.
- Children also learn the strategies and skills needed to manage:
  - Specific requests or pressure to provide (or forward) such images
  - The receipt of such images

This policy on sexting is also shared with children so they are aware of the processes the school will follow in the event of an incident.

## Serious violence

All staff are aware of indicators which may signal that children are at risk from or 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 well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs.

## Sexual violence and sexual harassment between children

### Context

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and



may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that **all** victims are taken seriously and offered appropriate support. Staff must be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff must be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “children just being children” and,
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

## What is Sexual violence and sexual harassment?

### Sexual violence

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003<sup>19</sup> as described below:

- **Child Criminal Exploitation: County Lines** Criminal Exploitation of Children (CCE) is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:
  - can affect any child or young person under the age of 18 years; national crime agency human-trafficking
  - can affect any vulnerable adult over the age of 18 years.
  - can still be exploitation even if the activity appears consensual.
  - can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
  - can be perpetrated by individuals or groups, across genders, and young people or adults; and
  - is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

We recognise that our initial response is important and so staff will take any allegation seriously and work in ways that support children and keep them safe.



If a staff member feels that a young person might be at risk of County Lines exploitation, they must follow procedures but if they feel there is an immediate risk of harm, they must contact the police – their Local Children’s Protection Officer.

All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:

- unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
- increased absence from school.
- change in friendships/relationships with others/groups.
- significant decline in performance.
- signs of self-harm/significant change in wellbeing.
- signs of assault/unexplained injuries.

Please also refer to KCSIE 2020 and Metropolitan Police Guidance for Schools & Colleges (Safeguarding children from Sexual Violence, Child Sexual Exploitation & Harmful Practices 2020)

### **Contextual safeguarding**

All staff need to have an awareness that factors outside the school could contribute to abuse taking place, and there needs to be active consideration of these risks.

### **Mental Health**

All staff must be aware that events, abuse, neglect, or exploitation can have an effect on a child’s mental health and therefore a lasting impact on a child’s future development. If you are worried about a child’s mental health it is a safeguarding concern and you must speak to the DSL. School has a central role to play in enabling their pupils to be resilient and to support good mental health and well-being. We must promote good mental health and well-being for all children and staff. Education about relationships and health can be important vehicles through which schools can teach pupils about mental health and well-being. Primarily, children need to have clear expectations of behaviour, well communicated social norms and routines. Clear boundaries and consistency allow a child to feel safe, safe to explore, safe to learn and safe to ‘be’ which is the basis of our ethos, here at school. At this age, being vigilant through observation, listening, and noticing alterations in behaviour, keeping in touch with the family and asking for any information of things happening at home which might have an effect on the child – vigilance together with communication, discussions and books, books that can highlight events in their lives – seeing how others cope in similar situations. The most effective way to encourage good mental health is to create a culture where calm, dignity and structure encompass every space and activity. We must adhere to our clear behaviour expectations, consistently role model to the children and continue to have high expectations.



The World Health Organisation defines “mental health as a state of well-being in which every individual recognises their potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to their own community.”

Short term stress and worry are a normal part of life but when this impacts on the child’s well-being over time or at the same time as other difficulties then these can lead to mental health difficulties. They can be:

- Emotional Disorders: phobias, anxiety, depression
- Conduct Disorders: stealing, defiance, aggression, anti-social behaviour
- Hyperkinetic Disorders: overactivity, inattention and impulsivity, constantly fidgeting and acting without thinking, (ADHD falls in this category- Attention Deficit Hyperactivity Disorder)
- Developmental Disorders: delay in acquiring skills such as speech, social ability, bladder control
- Attachment Disorders: abnormal attachment to parents/carers
- Trauma Disorders: post -traumatic stress disorders
- Other mental Health Disorders: including eating disorders, habit disorders, sleep disorders and psychotic disorders such as schizophrenia and manic-depressive disorders.

We, the staff, cannot diagnose, but we can provide a safe and affirming place to ‘be’ for children where they can develop a sense of belonging and feel able to trust, and talk openly, with adults about their problems. In school some of the risk factors for mental health are:

- Bullying (including online)
- Breakdown or lack of friendships
- Deviant peer influences
- Discrimination
- Peer pressure
- Peer on peer abuse
- Poor pupil to teacher /school staff relationships

**In order to protect children’s mental health and well-being we need:**

- Clear policies on behaviour and bullying
- Staff code of conduct
- Open door policy for children to raise problems
- A whole school approach to promoting good mental health
- Good pupil to staff/teacher relationships
- Positive classroom management
- A sense of belonging



- Positive peer influences
- Positive friendships
- Effective safeguarding and child protection policies
- An effective early help process
- Appropriate procedures to ensure staff are confident to raise concerns

**Possible mental health problems will have symptoms such as:**

- Emotional state of child: fearful, withdrawn, low self-esteem
- Behaviour: aggressive or oppositional, habitual body rocking
- Interpersonal Behaviours: indiscriminate contact, affection seeking, overfriendliness or excessively 'good' behaviour to prevent disapproval; failing to seek out or accept comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour or lack of ability to understand and recognise emotions.

Adverse childhood experiences that may affect a child's mental health are loss and separation, life changes such as the birth of a sibling, moving house, changing school and traumatic experiences such as the death of someone, abuse, neglect, bullying, terrorism and a natural disaster. Covid-19 has a large effect on a lot of people, and we cannot know how badly affected a person, family or community are. Give the children opportunities to talk about their experiences and ask their parents how they are.

'Relationship Education' (Early Years & Primary) and 'Relationship and Sex Education and Health Education' (Year 7 and up) are now mandatory. We refer to Relationships education (Primary) updated 9 July 2020. The focus is on teaching the fundamental building blocks and characteristics of positive relationships, with particular reference to friendships, family relationships, and relationships with other children and adults. Children need to be aware of online relationships and staff need to be able to manage difficult questions being aware that sex education is not mandatory and that we need to take into consideration a child's background and parental preferences.

**Transferable Risk**

This has been added to cover where an individual adult may have behaved or has behaved in a way that indicates they may not be suitable to work with children. The reason is because of TRANSFERABLE RISK. Where a member of staff, supply or volunteer is involved in an incident at school which does not involve children but could have impact on their suitability to work with children e.g. A member of staff or supply/volunteer is involved in a domestic dispute at home. No children were involved but schools need to consider what triggered these actions and could a child in school trigger the same reaction, therefore being put at risk.

An example of a Transferable Risk is where a member of staff or volunteer is involved in domestic violence at home; no children were involved, but schools need to consider what triggered these actions/violence and therefore, could a child in school trigger the same or similar reactions, thus putting the child at risk.



## **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The Prevent duty is part of the school’s wider safeguarding obligations. Designated safeguarding leads and other senior leaders take advice from the Revised Prevent duty guidance: for England and Wales. The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

The school fulfils the duty in the following ways:

- **Working in Partnership**

The school works in partnership with the Local Borough to seek advice, support and guidance to support children at risk.

- **IT Policies**

The school makes sure that children are safe from terrorist and extremist material when accessing the internet in school. We ensure suitable filtering is in place.

We offer workshops on Internet Safety to the Elementary Children and parent body.

- **Training**

All staff undertake Prevent Training in order to support each other in protecting children at risk.

- **Curriculum**

We focus on promoting basic British values in daily life at school that focus on democracy, diversity, respect, equality and fairness. We encourage and promote debates around such issues and help children manage their arguments and perspectives.

## **Preventing Radicalisation**

There is no place for extremist views of any kind in our school, whether from internal sources – children, staff or external sources - school community, external agencies or individuals. Our children see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens. As a school we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for children and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our children. Please see **Preventing Extremism and Radicalisation Policy**.





### **Procedure where there are concerns about extremism**

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 Directors can call to raise concerns about extremism with respect to a child. 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.

Protecting children from the risk of radicalisation is seen as part of the schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff must be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff must use their professional judgement in identifying children who might be at risk of radicalisation and act proportionate.

### **Visiting Speakers**

Visiting speakers will be accompanied by a member of staff.

If a child is at risk of being drawn into radicalisation then concerns must be reported to the DSL who will assess the risk and if appropriate refer to either Channel or Children's Social Care.

### **Trafficked children**

Any child transported, for exploitive reasons, is considered to be a trafficking victim, whether for not they have been forced or deceived. This is partly because it is not considered possible for children to give informed consent.



Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, fraud, and involvement in criminal activity such as pick pocketing, theft and working in cannabis farms. There are numerous cases of minors being exploited in the sex industry.

Further reading:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file177033/DFE-00084-2011.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file177033/DFE-00084-2011.pdf)

### **Private Fostering**

Private fostering is where a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent or a person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of the school staff through the normal course of their interaction, and promotion of learning activities with children. The school should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

Teachers have a legal duty to notify the local authority of a private fostering arrangement that comes to their attention, where they are not satisfied that the local authority have been, or will be, notified of the arrangement by the parent/carer.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. School staff should be aware of contact details and referral routes into the Local Housing Authority so that they can raise and progress concerns at the earliest opportunity. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing homelessness.

### **Children with Family Members in Prison**

These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. NICCO (National Information Centre on Children of Offenders) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for these children.

### **Education at Home**

Where children are being asked to learn online at home the department has provided advice to support schools to do so safely: [Safeguarding-and-remote-education](#) and [Safeguarding-in-schools-colleges-and-other-providers](#)

Members of the Board of Directors and Proprietors should ensure that all staff undergo regular updated online safeguarding training in alignment with our safeguarding approach.



### **Allegations against staff**

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates they would pose a risk of harm to 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. The 2020 version of KCSiE removes references to allegations, opening this up to ensure that staff think about their responsibilities in relation to any concerns, regardless of whether there is an allegation or not.

### **Suspension**

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



### 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 Head of School (or chair of the board where the Head of School 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 considering 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.

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

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

Where the police are involved, wherever possible the Board of Directors 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.



## **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 personnel 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 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, unproven 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 child(ren) 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 child at the school.

## **Confidentiality**

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



## **Supporting those Involved**

Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact a colleague for support. They should be given access to welfare counselling or medical advice where this is provided for by the employer.

The case manager should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. Particular care must be taken to keep the person informed of their case if they have been suspended. Social contact with colleagues should not be prevented unless there is evidence that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents of the child involved should be told of the allegation as soon as possible, unless where police and social services are involved, then a strategy must be decided upon. The parents must be informed of the progress of the case. Parents should be informed of the requirement to maintain confidentiality over any allegations made against teachers whilst the case is being investigated.

Support will be given and the correct procedure will be followed after any allegation whether the accused is a child, a member of staff, a member of the senior management team or a parent.

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

### Whistleblowing

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, they should follow the School's Whistle Blowing policy. Other whistleblowing channels may be open to staff: General guidance can be found at - Advice on whistleblowing The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 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).

### The use of Mobile Phones and Cameras

The School's policy on the use of mobile phones and cameras is as per the Child Protection and Safeguarding Policy Statutory Framework and can also be found in the POLICY AND





AGREEMENT FOR USE OF INTERNET/EMAIL/MOBILE PHONES, in the Staff Code of Conduct and includes the following:

- Any personal digital recording device including personal mobile phones, cameras and video recorders cannot be used when in the presence of children either on school premises or when on outings.
- All mobile phones must be stored securely within the setting during contact time with children. (This includes staff, visitors, parents, supply, volunteers, and students).
- No parent is permitted to use their mobile phone or use its camera facility whilst inside the classroom. School policy regarding this matter should be explained clearly to Parents by the Lead Teacher.
- Mobile phones must not be used in any teaching area within the setting or within the bathroom area.
- In the case of a personal emergency staff should use the school telephone. It is the responsibility of all staff to make families aware of the school telephone numbers.
- Personal calls may be made in non-contact time but not within the teaching areas.
- Personal mobiles, cameras or video recorders should not be used to record classroom activities. ONLY school equipment should be used.
- Photographs and recordings can only be transferred to and stored on a school computer before printing.
- All telephone contact with Parents/Carers must be made on the school telephone.
- During outings nominated staff will have access to the school mobile which can be used in an emergency or for contact purposes.
- In the case of school productions, Parents/carers are permitted to take photographs of their own child in accordance with school protocols which strongly advise against the publication of any such photographs on Social networking sites.

## **SAFER RECRUITMENT**

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 mental and physical fitness to carry out their work responsibilities.
- 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 at least two references on all short-listed candidates, including internal candidates, before final appointment. We will scrutinise and verify 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 a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

The governing body and school leadership team are responsible for ensuring the school follows recruitment procedures that help to identify, deter, or reject people who might abuse children. It adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place (see the school's 'Safer Recruitment' policy for further information). It ensures that volunteers are appropriately supervised in school.

We will ensure that our Recruitment and Selection Policy is robust in following up at least two references, (references are obtained after a person has interviewed and are shortlisted



prior to being conditionally offered a position so that the interview process does not become discriminatory in any way – this is best practice as described by NSPCC – Safer Recruitment) DBS checks and career gaps. At least one member of the selection panel has undertaken appropriate training to ensure that interviews to appoint staff reflect the importance of safeguarding children. The school **Safer Recruitment policy** and procedures set out the process in its entirety and includes details of the required checks and the timescale which governs.

All Directors 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 Directors:

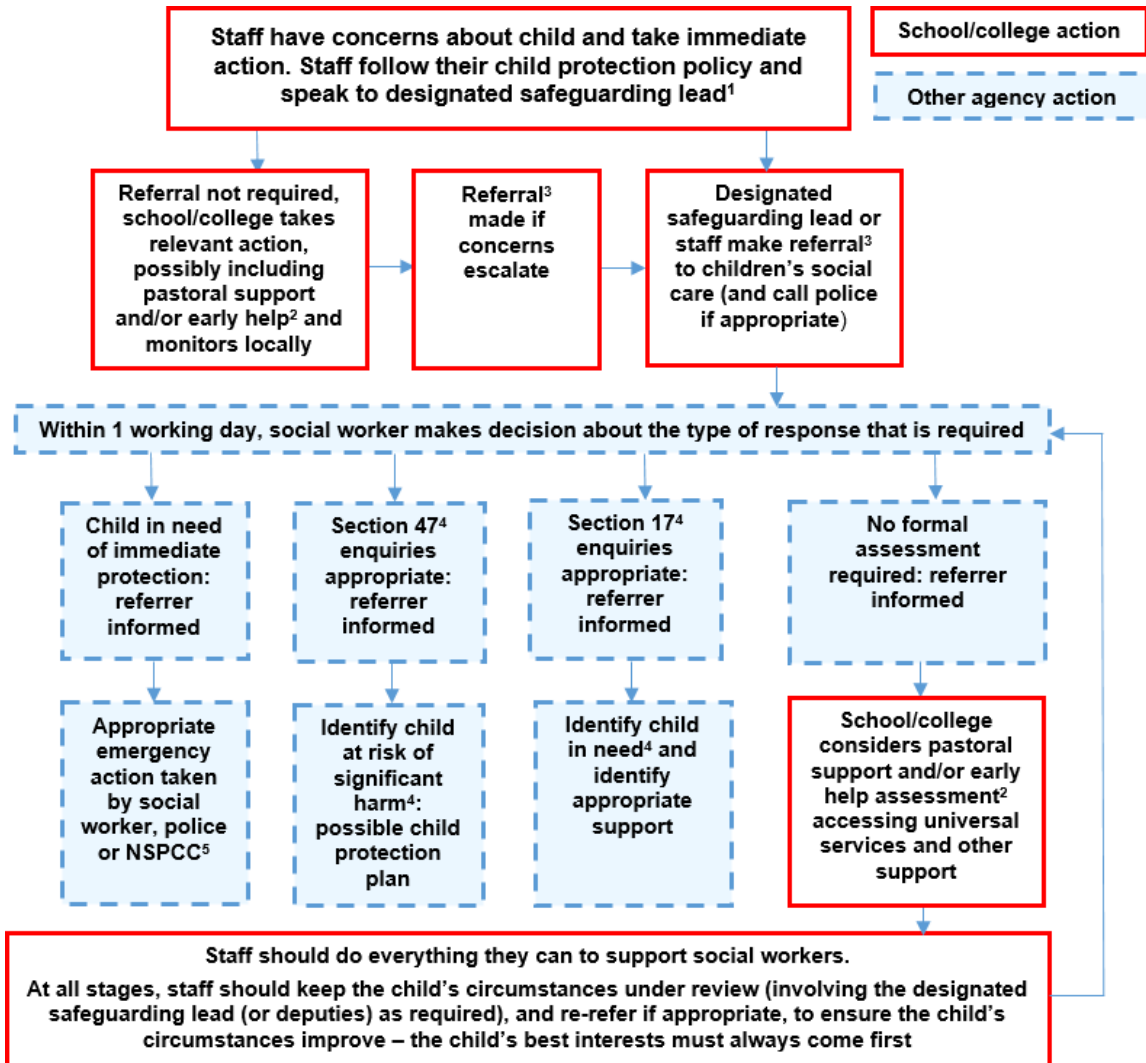
- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### **Staffing and Volunteering**

- Applicants for posts within the setting are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974.
- Candidates are informed of the need to carry out ‘enhanced disclosure’ and barred list (for posts where there will be direct contact with children) checks with the Disclosure and Barring Service before posts can be confirmed.
- Where applicants are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.
- We abide by Ofsted requirements in respect of references and Disclosure and Barring Service checks for staff and volunteers, to ensure that no disqualified person or unsuitable person works at the setting or has access to the children.
- Volunteers do not work unsupervised.
- We abide by the Protection of Children Act requirements in respect of any person who is dismissed from our employment or resigns in circumstances that would otherwise have led to dismissal for reasons of child protection concern.
- We have procedures for recording the details of visitors to the setting.
- We take security steps to ensure that we have control over who comes into the setting so that no unauthorised person has unsupervised access to the children.



## Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).



## **APPENDIX ONE**

The School fully recognises its responsibilities for safeguarding and protecting children according to section 157 of the 2002 Education Act. As part of that duty, we have regard to:

- 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 children 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 Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [Statutory Framework for the Early Years Foundation Stage](#)
- Working Together to Safeguard Children (DfE 2018) (WTSC)
  - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729914/Working\\_Together\\_to\\_Safeguard\\_Children-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)
- DfE guidance Keeping Children Safe in Education (KCSIE) Part One - information for all school and college staff and Appendix 1(DfE, September 2020) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/707761/Keeping\\_Children\\_Safe\\_in\\_Education - September 2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707761/Keeping_Children_Safe_in_Education_-_September_2019.pdf)
- London Safeguarding Children Procedures, March 2019 <http://www.londoncp.co.uk/>
- [Teaching online safety in schools \(DfE, 2019\)](#)



- Ofsted guidance 'Inspecting safeguarding in early years, education and skills' (2019) <https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills-from-september-2015/inspecting-safeguarding-in-early-years-education-and-skills-settings>
- [Sexual violence and sexual harassment between children in schools and colleges](#) (DfE, 2018)
- [Criminal Exploitation of children and vulnerable adult - county lines guidance \(Home Office, 2018\)](#)
- Children and Social Work Act, 2017
- Early Years and Foundation Stage Framework, 2017 (EYFS) [https://www.foundationyears.org.uk/files/2017/03/EYFS\\_STATUTORY\\_FRAMEWORK\\_2017.pdf](https://www.foundationyears.org.uk/files/2017/03/EYFS_STATUTORY_FRAMEWORK_2017.pdf)
- [Preventing and Tackling Bullying \(DfE, 2017\)](#)
- [Preventing youth violence and gang involvement \(Home Office, 2015\)](#)
- Female Genital Mutilation Act 2003 (S. 74 - Serious Crime Act 2015)

All staff have read and signed to say that they have read and understood Part One of KCSIE 2020 as well as Annex A.

**Supporting Guidance** (to be read and followed alongside this document)

- Information Sharing Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)
- What to do if you are Worried a Child is being Abused
  - [What to do if you're worried a child is being abused - Publications - GOV.UK](#)
- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings - Safer Recruitment Consortium, September 2019
  - <https://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf>
- Mental Health & Behaviour in Schools [Mental health and behaviour in schools - Publications - GOV.UK](#)
- Teachers Standards 2012 <https://www.gov.uk/government/publications/teachers-standards>
- Safeguarding Disabled Children – Practice Guidance - DOH, 2009 <https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance>



## **APPENDIX TWO**

### **Contact Details for reporting concerns to Social Care/LADO**

#### **Hampstead and Abbey Road**

Social Care – Camden Duty and Assessment Team, Tel. 020 7974 4444

L.A.D.O Bodil Mlynarska 020 7974 6999

#### **Notting Hill**

Social Care - Kensington and Chelsea, Portobello South Team, Tel. 020 7341 5786

L.A.D.O Angela Flahive 020 7361 3467

#### **Bayswater**

Social Care - Westminster Access Team, Tel. 020 7641 4000

L.A.D.O Jane Foster 020 7641 6108

#### **Hornsey Rise**

Social Care - Contact Team, Tel. 020 7527 7400

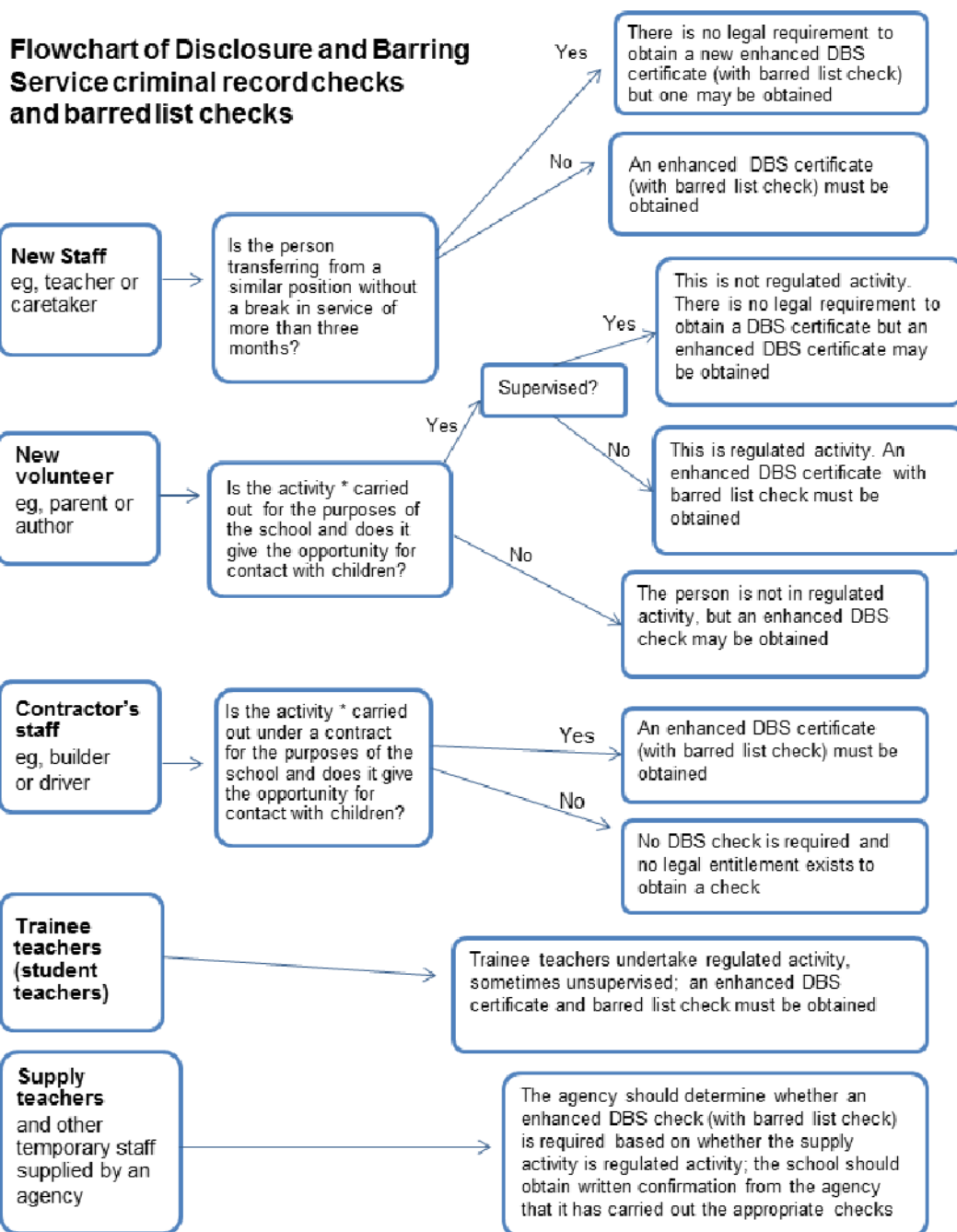
L.A.D.O 020 7527 8066

### **Numbers for reporting allegations against staff to OFSTED**

**Carol Gayles:** Tel: 01325 340541 ext. 640541/[carol.gayles@education.gsi.gov.uk](mailto:carol.gayles@education.gsi.gov.uk)



## APPENDIX THREE



\* Activities listed under the guidance's definition of regulated activity and which are carried out 'frequently'





APPENDIX FOUR

## CONCERN FORM

Child's Name:	
School:	
<b>Shared With:</b>	
	Date:
If not shared, state the reasons why:	
Children's Social Care	<input type="checkbox"/>
	Date:
Designated Safeguarding Lead	<input type="checkbox"/>
	Date:
Parent/Carer	<input type="checkbox"/>
	Date:
What have you noticed? Why are you concerned? (Include as much detail as you can eg. The words that were said, description of injury, date notices etc.)	
Parent/Carers response (try to record the words and also include anything you notice about the parent)	
Any further information/action to be taken/comments	
Print name:	
Position:	
Signed:	
Date:	