



**Five  
Rivers®**

Education  
Safeguarding  
Policy &  
Procedure

*'Five Rivers is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment'*

Policy Owner	Head Teacher
Authoriser	Head of Education
Date of Original Issue	01/09/2022
Date of Last Review	01/09/2023
Date of Next Review	01/09/2024
Version	V2

**© Five Rivers Child Care Limited 2022, All Rights Reserved.**

**The content of this policy is protected by the copyright laws of England and Wales and by international laws and conventions. No content from this policy may be copied, reproduced or revised without the prior written consent of Five Rivers Child Care Limited. Copies of content may be saved and/or printed for use in relation to the business and affairs of the Company only.**

# Contents

- 1. Policy ..... 3
  - 1.1 Policy Statement ..... 3
  - 1.2 Terms and Definitions ..... 3
  - 1.3 Data Protection ..... 4
  - 1.4 Disclosure of Information ..... 4
  - 1.3 Further Information ..... 4
  - 1.4 Important contacts ..... 7
- Equality Statement ..... 6
- 2. Procedure ..... 10
  - What School Staff Should do if a Child is in Danger or at Risk of Harm ..... 10
  - Roles and responsibilities ..... 13
  - Code of Conduct ..... 17
  - Confidentiality and Information Sharing ..... 22
  - Procedure if you have concerns about a child’s welfare ..... 24
  - Online Safety and the use of mobile technology ..... 30
  - Notifying parents or carers ..... 31
  - Pupils with special educational needs, disabilities or health issues ..... 31
  - Pupils with a social worker ..... 32
  - Children in care ..... 32
- Safeguarding children who come from Black, Asian and minoritised ethnic communities ..... 32
  - Complaints and concerns about members of staff ..... 33
  - Whistleblowing ..... 33
  - Record Keeping ..... 33
  - Training ..... 34
  - Monitoring Arrangements ..... 35
  - Links with other policies ..... 35
- Appendixes ..... 34
- Appendix 1: types of abuse ..... 36
- Appendix 2: Safer Recruitment ..... 38
- Appendix 3: allegations of abuse made against staff ..... 44
- Children missing from education ..... 52
- Preventing radicalisation ..... 57
- Sexual violence and sexual harassment between children in schools ..... 59
- Serious violence ..... 59

## 1. Policy

### 1.1 Policy Statement

The school aims to ensure that:

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

### 1.2 Terms and Definitions

1.2.1 The below table sets out a number of terms and definitions used within this document:

<b>Term</b>	<b>Definition</b>
<b>Safeguarding and promoting the welfare of children</b>	<ul style="list-style-type: none"><li>› Protecting children from</li><li>› maltreatment</li></ul> <p>Preventing impairment of children’s mental and physical health or</p> <ul style="list-style-type: none"><li>› development</li></ul> <p>Ensuring that children grow up in circumstances consistent with the</p> <ul style="list-style-type: none"><li>› provision of safe and effective care</li></ul> <p>Taking action to enable all children to have the best outcomes</p>
<b>Child protection</b>	is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
<b>Abuse</b>	is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
<b>Sharing of nudes and semi-nudes</b>	(also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.
<b>Children</b>	includes everyone under the age of 18.

<b>Victim</b>	is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
<b>Alleged perpetrator(s) and perpetrator(s)</b>	are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

### 1.3 Data Protection

- 1.3.1 Five Rivers Child Care supports the objectives of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and other legislation relating to Data Processing, including the Human Rights Act 1998, Regulation of Investigatory Powers Act 2000 and the Freedom of Information Act 2000. Five Rivers Child Care has a statutory obligation to process personal data in accordance with the provisions of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
- 1.3.2 Every member of Five Rivers Child Care has an obligation to ensure that the information they process (use) is collected, maintained and disclosed in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and the Five Rivers Child Care Data Protection Policy.

### 1.4 Disclosure of Information

- 1.4.1 Any use or disclosure of information held within Five Rivers Child Care, without there being a legitimate purpose or legal basis, will be classed as unauthorised and is a criminal offence under Section 55 of the Act Right of Access (Subject Access Requests).

### 1.3 Further Information

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance](#)

Handbook. We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

This policy is also based on the following legislation:

- › Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- › [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- › Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- › Part 1 of the schedule to the [Non-Maintained Special Schools \(England\) Regulations 2015](#), which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school
- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter- Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be

- › more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination. 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

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- › The local authority (LA)
- › A clinical commissioning group for an area within the
- › LA The chief officer of police for a police area in the LA area

### Equality Statement

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

We give special consideration to children who:

- › Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- › Are young carers
- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- › Have English as an additional language
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- › Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member’s mental health needs
- › Are looked after or previously looked after (see section 12)
- › Are missing from education
- › Whose parent/carer has expressed an intention to remove them from school to be home educated

## 1.4 Important contacts

Head of FRCC Education			
James Hall	James.hall@five-rivers.org	07935 066031	
Deputy	<a href="mailto:Shellie.Barcroft@five-rivers.org">Shellie.Barcroft@five-rivers.org</a>	07718 571525	
Director of Children's Services	<a href="mailto:Nicci.Willock@five-rivers.org">Nicci.Willock@five-rivers.org</a>	01722 435763	
Clannad School			
Name	Role	Contact Email	Contact number
Utibe Abasi Umoren	Head teacher DSL	<a href="mailto:utibe-abasi.umoren@five-rivers.org">utibe-abasi.umoren@five-rivers.org</a>	07702864877
Naome Muzeremwi (RM)	Residential Manager	<a href="mailto:Naome.Muzeremwi@five-rivers.org">Naome.Muzeremwi@five-rivers.org</a>	07917 417050
<b>Local Authority</b>	0208 461 7669 or <a href="mailto:BSCP@bromley.gov.uk">BSCP@bromley.gov.uk</a> for referral 020 461 7669 <a href="mailto:lado@bromley.gov.uk">lado@bromley.gov.uk</a> to report concerns		
Park House School			
Teresa Brown	Senior Headteacher/ Deputy DSL	<a href="mailto:Teresa.brown@five-rivers.org">Teresa.brown@five-rivers.org</a>	07563381870
Kristina Baker	Deputy DSL	<a href="mailto:Kristina.baker@five-rivers.org">Kristina.baker@five-rivers.org</a>	07889417413
Sally Pitkin	Headteacher DSL	<a href="mailto:Sally.Pitkin@five-rivers.org">Sally.Pitkin@five-rivers.org</a>	07715196777
<p><b>Somerset Children's Services:</b> <a href="#">Report a child at risk (somerset.gov.uk)</a> Tel: 0300 123 2224 Email: <a href="mailto:Childrens@somerset.gov.uk">Childrens@somerset.gov.uk</a>  <b>Emergency Duty Team:</b> 0300 123 2327 <b>Dorset Children's Services:</b> <a href="#">Children's Advice and Duty Service (ChAD) for professionals - Dorset Council</a> CHaD – Children's Advice and Duty Service (for professionals) Tel: 01305 228558            Email: <a href="mailto:childrensadvicanddutysevice@dorsetcouncil.gov.uk">childrensadvicanddutysevice@dorsetcouncil.gov.uk</a></p> <p><b>Bournemouth Children's Services:</b> <a href="#">Concerns about child abuse or wellbeing (bcpcouncil.gov.uk)</a> <b>First Response Hub</b> – referral form on website for professionals: <a href="https://www.bcpcouncil.gov.uk/Children-young-people-and-families/Childrens-social-care/docs/BCP-Inter-agency-referral.docx">https://www.bcpcouncil.gov.uk/Children-young-people-and-families/Childrens-social-care/docs/BCP-Inter-agency-referral.docx</a> Tel: 01202 735046 Email: <a href="mailto:childrensfirstresponse@bcpcouncil.gov.uk">childrensfirstresponse@bcpcouncil.gov.uk</a> <b>Out of hours:</b> 01202 738256 Email: <a href="mailto:ChildrensOOHS@bcpcouncil.gov.uk">ChildrensOOHS@bcpcouncil.gov.uk</a></p> <p><b>Devon Children's Services:</b> <a href="#">Children's social care - Devon County Council</a>: <a href="#">Children's social care - Devon County Council</a> Email: <a href="mailto:Mashsecure@devon.gov.uk">Mashsecure@devon.gov.uk</a> Tel: 0345 155 1071  <b>Emergency Duty Team:</b> 0345 600 0388</p> <p><b>Plymouth Children's Services:</b> <a href="#">Report child abuse or neglect   PLYMOUTH.GOV.UK</a> Tel: 01752 66800 Email: <a href="mailto:gateway@plymouth.gov.uk">gateway@plymouth.gov.uk</a> Referral form: <a href="https://plymouthscb.co.uk/making-a-referral/">https://plymouthscb.co.uk/making-a-referral/</a> <b>Out of hours:</b> 01752 346984</p>			
Fountain House School			
Matthew Palmer	Executive Head Teacher DSL	<a href="mailto:matthew.palmer@five-rivers.org">matthew.palmer@five-rivers.org</a>	07703 830454
Joshua Gould	Deputy DSL	<a href="mailto:Joshua.Gould@five-rivers.org">Joshua.Gould@five-rivers.org</a>	07399828901
<p><b>Local Authority</b> - Duringadouffltice hours Call the Duty and Advice team on 0113 376 0336 (Monday to Friday, 8am to 6pm). Out of office hours: If the issue can't wait until the next working day please contact the Children's Emergency Duty Team on 0113 376 0469 and provide us with as much information as possible. You can also email us on <a href="mailto:childrensedt@leeds.gov.uk">childrensedt@leeds.gov.uk</a></p>			
The Spires and 1Ace South			

Kirsty Fletcher	Head Teacher DSL	<a href="mailto:Kirsty.Fletcher@five-rivers.org">Kirsty.Fletcher@five-rivers.org</a>	07818098531
Louise Bethel	Senior Head Teacher Deputy DSL	<a href="mailto:Louise.Bethel@five-rivers.org">Louise.Bethel@five-rivers.org</a>	07525 909328
Elain Watkins	Deputy Headteacher Deputy DSL	<a href="mailto:Elain.Watkins@five-rivers.org">Elain.Watkins@five-rivers.org</a>	07919918835
Andi Teasdale	Senior Lead Teacher Deputy DSL	<a href="mailto:Andi.Teasdale@five-rivers.org">Andi.Teasdale@five-rivers.org</a>	07703830454

**Local Authority** -Contact Designated Officer (direct line) **01225 718079** or **01225 713945** to report concerns. To consult if unsure MASH: Tel: **0300 456 0108** (Monday-Friday) Email: [ladowiltshire@gov.uk](mailto:ladowiltshire@gov.uk)

### Endeavour House School

Ann- Marie Allen	Head Teacher/ DSL	<a href="mailto:Ann-marie.allen@five-rivers.org">Ann-marie.allen@five-rivers.org</a>	07514643928
Soha Gassoub	Deputy Headteacher/ Deputy DSL	<a href="mailto:Soha.Gassoub@five-rivers.org">Soha.Gassoub@five-rivers.org</a>	07759709682

**Local Authority** - Email: [CPAT.referrals@redbridge.gov.uk](mailto:CPAT.referrals@redbridge.gov.uk) Telephone: **02087083885** Emergency Duty Team on **020 8708 5897**.

### Field Gate School and 1Ace Doncaster

Sarah Weston	Head Teacher/ DSL	<a href="mailto:Sarah.Weston@five-rivers.org">Sarah.Weston@five-rivers.org</a>	07521 051358
Maria Cunliffe	Deputy Headteacher/ Deputy DSL	<a href="mailto:Maria.Cunliffe@five-rivers.org">Maria.Cunliffe@five-rivers.org</a>	07519 376344
Gemma Steinert	Deputy DSL	<a href="mailto:Gemma.Steinert@five-rivers.org">Gemma.Steinert@five-rivers.org</a>	07514992008
Theresa Pilgrim	Deputy DSL	<a href="mailto:Theresa.Pilgrim@five-rivers.org">Theresa.Pilgrim@five-rivers.org</a>	07523679012
Matthew Palmer	Executive Headteacher	<a href="mailto:Matthew.Palmer@five-rivers.org">Matthew.Palmer@five-rivers.org</a>	07703830454

**Doncaster Social Services:** Address- Mary Woollett Centre, Danum Road, Doncaster, South Yorkshire, DN4 5HF Tel: 01302 796 191 Email: About Us | Doncaster Safeguarding Children Partnership ([dscp.org.uk](http://dscp.org.uk))  
**Duty children's social worker emergency contact:** 01302 737 777

**Rotherham Social Services: Address-** Riverside house, Main Street Rotherham S60 1A E Tel: 01709 336080 Email: Rotherham Metropolitan Borough Council Duty children's social worker emergency contact: 01709 336080

**Sheffield Social Services:** Address- 42 Spital Hill, Sheffield S4 7LG Tel: 0114 203 9591 Email: Safeguarding Sheffield Children – sscb Duty children's social worker emergency contact: 0114 2734855

**North Lincs Social Services:** Address- Church Square house 30-40 High Street, Scunthorpe DN15 6NL Tel: 01724 296500 Email: North Lincolnshire Council | Keeping children safe in North Lincolnshire – North Lincolnshire Council ([northlincs.gov.uk](http://northlincs.gov.uk)) Duty children's social worker emergency contact: 01724 296555

Contact details for the Local Authorities covered above: SHEFFIELD OFFICE HOURS OUT OF OFFICE  
HOURS Adult Access Team 24hr No 01142734908 Sheffield Safeguarding Adult Board 01142736870

### Willow View and 1Ace North

Danielle Hulme	Head Teacher/ DSL	<a href="mailto:Danielle.hulme@five-rivers.org">Danielle.hulme@five-rivers.org</a>	07514647226
Owain Hughes	Deputy Headteacher/ Deputy DSL	<a href="mailto:Owain.Hughes@five-rivers.org">Owain.Hughes@five-rivers.org</a>	07709716265
Catherine Geraghty	Deputy DSL	<a href="mailto:Catherine.Geraghty@five-rivers.org">Catherine.Geraghty@five-rivers.org</a>	07546696212



Matthew Palmer	Executive Headteacher	<a href="mailto:Matthew.Palmer@five-rivers.org">Matthew.Palmer@five-rivers.org</a>	07703830454
<p><b>Oldham:</b> Oldham Multi Agency Safeguarding Hub (M.A.S.H) to report your concern to: Multi Agency Safeguarding Hub on <b>0161 770 7777</b> (child.mash@oldham.gov.uk) Out of hours contact the Emergency Duty Team on 0161 770 6936</p> <p><b>Rochdale:</b> If you have any enquiries, please contact; <b>01706 927700</b> /rbsb.admin@rochdale.gov.uk The office is open Monday –Friday 08.45 -16.45 To report a concern, call <b>0300 303 0440</b> The office is open Monday –Friday 08.30 -16.45. Out of hours emergency call <b>0300 303 8875</b></p>			
<p><b>Manchester:</b> Manchester Contact Centre Telephone: <b>0161 234 5001</b></p> <p><b>Bury</b> Multi-Agency Safeguarding Hub (MASH) Team on <b>0161-253-5678</b> or outside of office hours the Emergency Duty Team on <b>0161-253-6606</b>.</p> <p><b>Trafford:</b> If you are worried about the safety or wellbeing of yourself or another child or young person under the age of 18 then please phone Trafford Children's First Response on <b>0161 912 5125</b> during the day, or the Emergency Duty Team on <b>0161 912 2020</b> if it's an emergency at night or weekend.</p> <p><b>Stockport</b>• call <b>0161 217 6028</b> –Mon-Fri or <b>0161 718 2118</b> –evenings and weekends</p> <p><b>Tameside:</b> Telephone Contact Number <b>-0161 342 4101</b> Monday to Friday outside of normal hours weekends and public holidays Telephone Contact Number <b>-0161 342 2222</b></p>			
<b>1ACE Virtual</b>			
Marie. Barrowclough		<a href="mailto:Marie.barrowclough@five-rivers.org">Marie.barrowclough@five-rivers.org</a>	07935-001693

## 2. Procedure

### What School Staff Should do if a Child is in Danger or at Risk of Harm

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

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

#### **If a child is suffering or likely to suffer harm, or in immediate danger**

If you believe a child is suffering or likely to suffer from harm or is in immediate danger. Tell the DSL immediately so that they can take appropriate action.

A ClearCare form must also be written immediately.

See the following link to the GOV.UK webpage for reporting child abuse to your local council. <https://www.gov.uk/report-child-abuse-to-local-council>

#### **If a child makes a disclosure to you**

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions Stay calm and
- do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation on the clearcare safeguarding form as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL.
- Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- Bear in mind that some children may:
  - ↳ Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
  - ↳ Not recognise their experiences as harmful
  - ↳ Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriersNone of this should stop you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child.

You should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (such as on a child in need or child protection plan).

You must 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.

You should only discuss concerns with the designated person, head teacher or head of education. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

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

**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, Head of Education and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you taken with the DSL as soon as practically possible.

### **Early help assessment**

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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

### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

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

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

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

If, a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anyone can make a referral, however this should go to the DSL or Senior Leadership . Where referrals are not made by the designated safeguarding lead, the designated safeguarding lead should be informed, as soon as possible, that a referral has been made.

Staff should refer to [National Police Chief's Council guidance](#) on when to call the police to ensure that calls are appropriate and timely.

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

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

**Any teacher** who either:

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

Must report within 24 hours to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

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

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

### **If you have concerns about extremism**

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care and determine who will make the referral.

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

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

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

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

### **If you have a mental health concern**

Our schools have many pupils with Social and Emotional Mental Health. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Each of our pupils has a risk assessment and support plan. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by informing the DSL.

Each school also has their own clinician to support staff and young people. Each clinician is integrated within the team and able to advise on appropriate matters.

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

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

### **Roles and responsibilities**

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

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

Behaviour policy

›

## Pastoral support system

Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

## All staff

All of our staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE).

Staff who work directly with children are also expected to read annex B of KCSIE (about specific safeguarding issues).

All staff will:

- › Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- › Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- › Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g., sites they need to visit or who they'll be interacting with online)

Provide a safe space for pupils who are LGBT to speak out and share their concerns

All staff will be aware of:

- › Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education
- › The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early help and assessment
- › The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be

expected to play

- › What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- › The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- › The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- › The fact that children can be at risk of harm inside and outside of their home, at school and online
- › The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- › What to look for to identify children who need help or protection

Within this policy we outline in more detail how staff are supported to do this.

### **The designated safeguarding lead (DSL)**

The DSL is a member of the senior leadership team. Our DSL is named on the appendix for each individual school and at the top of this policy. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

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

When the DSL is absent, the deputy will act as cover.

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

- › Provide advice and support to other staff on child welfare and child protection matters
- › Take part in strategy discussions and inter-agency meetings and/or support other staff
- › to do so Contribute to the assessment of children
- › Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- › Have a good understanding of harmful sexual behaviour The DSL will also: If not the Headteacher, keep the headteacher informed of any issues
- › Liaise with the Education Senior Leadership team
- › Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- › Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- › Be confident that they know what local specialist support is available to support all

children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

- › Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

Meet weekly with the Senior Leadership team to discuss the current safeguarding concerns

## **The Board**

The board will:

- › Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- › Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- › Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- › Ensure our senior safeguarding board members monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- › Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- › Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - Obtain assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be



terminated if the other body fails to comply

The Head of Education will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate

All Board members will read Keeping Children Safe in Education in its entirety.

### **The headteacher**

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

- › Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- › Communicating this policy to parents/carers when their child joins the school and via the school website
- › Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- › Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- › Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- › Making decisions regarding all low-level concerns for pupils and staff, though they may wish to collaborate with the DSL on this

### **Code of Conduct**

#### **Exercise of Professional Judgement**

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight, however, behaviour that is illegal, inappropriate or inadvisable. Individuals are expected to make judgements about their behaviour, in order to secure the best interests and welfare of the students in their charge and in so doing, will be seen to be acting reasonably.

This means that where no specific guidance exists staff should:

- discuss the circumstances that informed their action, or their proposed action, with a senior colleague. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted.
- always discuss any misunderstanding, accidents or threats with a senior manager
- record discussions and actions taken, giving justification where appropriate.

## Power and Positions of Trust

As a result of the authority invested in their role, all adults working with children, young people and vulnerable adults in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people, and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

This means that staff should not:

- use their position to gain access to information for their own advantage and/or a student or family's detriment; use their power to intimidate, threaten, bully, coerce or undermine students
- use their status and standing to form or promote relationships with students, which are of a sexual nature
- display behaviour that may be viewed as favouritism.

Where a person aged 18 or over is in a position of trust with a student under 18, it is an offence for that person to engage in any sexual activity with or in the presence of that student, or to cause or incite that student to engage in or watch sexual activity.

## Confidentiality

Members of staff may have access to confidential information about students in order to undertake their everyday responsibilities. In some circumstances staff may be given additional highly sensitive or private information. They should never use confidential or personal information about a student or his/her family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the student.

Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need-to-know basis. In circumstances where the student's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which a member of staff may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on, without delay, to the staff with designated child protection responsibilities. If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from their DSL.

This means that staff:

- are expected to treat information they receive about children and young people in a discreet and confidential manner
- who are in any doubt about sharing information they hold or which has been requested of them, should seek advice from a senior member of staff
- need to be cautious when passing information to others, even a parent, about a child/young person
- need to be vigilant that they do not inadvertently betray confidences in casual

conversations with colleagues in staff rooms, corridors and in emails.

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, students and the public in general. There are risks involved with social networking sites.

This means that staff should not:

- behave in a manner which would lead any reasonable person to question their suitability to work with students or act as a role model. This applies both within and outside the working environment
- make sexual remarks to a student (including email, text messages, phone, letter or other)
- discuss their own sexual relationships with, or in the presence of, students
- discuss student sexual relationships in inappropriate settings or contexts
- have students as “friends” on social networking sites.

### Dress and Appearance

A person's dress and appearance are matters of personal choice. However, staff should consider the manner of dress and appearance appropriate to their professional role, which may be different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner, which could be considered as inappropriate, could render themselves vulnerable to criticism or allegation.

This means that staff should wear clothing which:

- promotes a positive and professional image
- is appropriate to their role
- is not likely to be viewed as offensive, revealing, or sexually provocative
- does not distract, cause embarrassment or give rise to misunderstanding

### Infatuations

Staff need to be aware that it is not uncommon for students to be strongly attracted to a member of staff and/or develop an infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff.

A member of staff, who becomes aware that a student may be infatuated with themselves or a colleague, should discuss this at the earliest opportunity with a senior colleague so that appropriate action can be taken. In this way, steps can be taken to avoid hurt and distress for all concerned.

This means that staff should:

- report any indications (verbal, written or physical) that suggest a student may be infatuated with a member of staff. This applies regardless of your relationship with the member of staff or the student. If you do not report such an incident, you are putting yourself in a vulnerable situation by observing incidents, which could be misconstrued, but not acting upon it, and therefore condoning it

- be careful when providing support to students that it is not being misconstrued.

### Social Contact

Staff should not establish or seek to establish social contact with students for the purpose of securing a friendship or to pursue or strengthen a relationship. Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should not enter into any social contact.

This means that staff should:

- report and record any situation which could be interpreted as compromising the school.

### Physical Contact (further guidance below regarding physical intervention)

There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they only do so in ways appropriate to their professional role.

A 'no touch' approach is impractical for some situations and may in some circumstances be inappropriate. When physical contact is made with students this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, disability and background. Staff should therefore use their professional judgement at all times. Staff should be particularly aware of the possible implications of making physical contact in a situation when they are alone with the student.

If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible and discussed with their line manager.

Extra caution may be required where it is known that a student has suffered previous abuse or neglect. In the student's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse.

This means that staff should:

- be aware that even well-intentioned physical contact may be misconstrued by the student, an observer or by anyone to whom this action is described.
- never touch a student in a way which may be considered indecent.
- always be prepared to explain actions and accept that all physical contact be open to scrutiny.

### Disclosures About Personal Life, Background and Opinions

Staff should be cautious when speaking to students about their personal life, background and opinions. This does not mean that any disclosures are inappropriate.

This means that staff should:

- never discuss their sex life with students
- not cause students to feel at all responsible for a member of staff's personal situation or uncomfortable about the level of detail being disclosed
- present balanced viewpoints when discussing politically or socially sensitive issues.

### Pupils in Distress

There are many occasions when a distressed student needs comfort and reassurance. This may include physical contact. Staff should always remain self-aware in order that their contact

is not threatening, intrusive or subject to misinterpretation. If staff are concerned that a student may cause themselves harm please contact the DSL and/or deputy for advice.

This means that staff should:

- consider the way in which they offer comfort to a distressed student.
- always tell a colleague when and how they offered comfort to a distressed student.

### Behaviour Management

All students have a right to be treated with respect and dignity. The use of humour can help to defuse a situation. The use of sarcasm, demeaning or insensitive comments towards students is not acceptable in any situation.

This means that staff should:

- follow our Behaviour Management Support policy
- not use force as a form of punishment
- try to defuse situations before they escalate
- keep parents/carers informed of any sanctions as appropriate.

### Sexual Contact with Young People

Any sexual behaviour by a member of staff with or towards a child or young person is both inappropriate and illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person consents or not.

The Sexual Offences Act

2003 makes it a criminal offence for a person over the age of 18, in a position of trust, to engage in any sexual activity with a child under 18. This applies even if the member of staff does not teach or support the child directly.

The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing students to engage in or watch sexual activity or the production of pornographic material.

Staff should be aware that conferring special attention and favour upon a student might be construed as being part of a 'grooming' process, which is an offence.

This means that staff should:

- not pursue sexual relationships with children and young people either in or out of school
- avoid any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.

### Educational Visits and After School Activities

Staff should take particular care when supervising students on any activity. During school activities that take place off the school site or out of school hours, a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity.

This means that staff should:

- conduct a risk assessment, signed and agreed by your manager before the trip goes ahead
- always have another adult present in out of school activities, unless otherwise agreed with senior staff in school
- ensure that their behaviour remains professional at all times
- staff should never smoke or drink alcohol when supervising students.

### Photography, Videos, Creative Arts

Parental consent will be expected before. Many school activities involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement. Staff should remain sensitive to any students who appear uncomfortable and should recognise the potential for misinterpretation.

Certain photos or images of individuals we use in school would be considered as “personal data” under the Data Protection Act – particularly where the individual is the focus of the image, and the image includes biographical facts about that individual. Staff must ensure that such images are handled properly, in line with the School’s Data Protection Policy.

In particular, staff are expected to:

- think about the individuals concerned - ensuring that the way the image is obtained or used is fair to them and is not likely to cause them distress
- be aware of the potential for misuse of personal data by others – particularly if it is put on the website
- ensure images are securely stored and used only by those authorised to do so.

This means that staff should:

- be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose
- ensure that all images are available for scrutiny in order to screen for acceptability.
- be able to justify images of students in their possession
- avoid using DVD / film footage with age ratings above the teaching group age
- This means that staff should not: take, display or distribute images of students unless they have written consent to do so.

### Mobile phones and cameras

Pupils are not allowed to use mobile phones in school, unless specifically identified in their individual support plan (ISP). Staff must monitor all use during education.

Staff are given a work mobile for use in school.

Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members’ personal phones will remain in a secure place during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

### Site Security

All employees have an ID badge. All employees must sign in when entering the school.

All visitors to the school must sign in the Staff register/Visitors book. This includes any contractors. No visitor must be left unsupervised at any time. Please see Contractors/Visitor policy.

### First Aid and Administration of Medication

Each school has trained first aiders/appointed person. Staff receive appropriate training before administering first aid or medication. When administering first aid, wherever possible, staff should ensure that another adult is present, or aware of the action being taken. Parents/carers should always be informed when first aid has been administered.

This means that staff should:

- adhere to the school policy for administering medication on our internal intranet system.
- make other staff aware of the task being undertaken.
- explain to the child what is happening.

### Physical Intervention by Staff

When applying measures such as restraint or isolating a child in response to incidents staff must consider all risks carefully and be trained in Pro-active responses. Restraint is used as last resort as part of our Trauma Informed Education Model. All children have a behaviour support plan and an individual risk assessment.

There may be times when adults in our school, in the course of their duty, for the safety of children and staff use physical intervention to restrain children. This should be exercised in line with our school behaviour policy.

The Headteacher requires the adult involved in any such incident to report this to him/her immediately (unless it was them who has exercised the restraint in which case the matter should be informed), and to record it in on a Critical Incident report form (held on Clear Care). These will be sent to the Head of Education who will check that physical intervention was appropriate and that it was conducted appropriately. Any witnesses to the incident must be identified. Incidents involving physical intervention will be reviewed at weekly safeguarding meetings and at monthly governance meetings.

### Safeguarding when teaching virtually, including 1ACE Virtual team

Pupils, parents, carers and teachers are reminded that the school's Child Protection and Safeguarding Policy still applies to all interactions between pupils and teachers. In that policy, there are specifically prohibited behaviours and reporting obligations to which teachers must adhere, whether they are at home, in the community or at school.

### Designated safeguarding lead

The DSL is responsible for:

- Ensuring that learners can easily identify their teachers by the Five Rivers corporate background when learning online.
- Ensuring non- attendance welfare calls take place

### Online safety at home

- All staff will continue to look out for any signs that indicate a child may be at risk online and will report and respond to concerns in line with the Child Protection Policy.
- Where necessary, referrals will be made to LADO, children’s social care and as required, the police.
- Learners are encouraged to report concerns to a member of staff or a trusted adult at home.

Where this is not possible, additional support can be accessed online via:

Childline: [www.childline.org.uk](http://www.childline.org.uk) - see notes.

UK Safer Internet Centre’s ‘Report Harmful Content’: <https://reportharmfulcontent.com>

National Crime Agency Child Exploitation and Online Protection Command (NCA-CEOP): [www.ceop.police.uk/safety-centre](http://www.ceop.police.uk/safety-centre)

- Parents/carers will continue to be made aware of what their children are being asked to do online, including the sites they will be asked to access.
- Parents/carers will continue to be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented. (see online learning agreement)
- We will ensure any sharing of information, communication and use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.
- All communication with learners and parents/carers will take place:
  - within school hours as much as possible. (Or hours agreed with the school to suit the needs of staff) using school provided communication channels; for example, Five Rivers email accounts and phone numbers *and* agreed systems *e.g.* *Microsoft Teams*
- All pupils are expected to sign an online learning agreement.
- Staff and learners will engage with online teaching and learning in line with existing behaviour principles as set out in our school behaviour policy and code of conduct.
- When delivering online learning, staff will:
  - only use online tools that have been evaluated and agreed by leadership.
- Ensure the approved Five Rivers corporate background is used when delivering the online lessons
- Ensure online learning activities are planned in accordance with our curriculum policies, taking learner needs and technology access into account.
- Record the length, time, date and attendance of any online lessons/contact held or made.
- Where online learning is taking place ‘live’ for example using webcams or chat facilities, staff and learners will ensure a safe and professional environment is maintained in line with our Teaching and Learning Policy.

### Record keeping for 1ACE Virtual staff

If a safeguarding concern is raised with a member of staff, a cause for concern is written and sent to the DSL.

If it is appropriate to refer the case to local authority children’s social care or the police, the DSL will make the referral.

Referrals will be discussed in the weekly safeguarding meeting.

Cause for concern forms are kept in the Business Support folder, only accessible to DSLs.

A tracker is kept to keep a record of concerns, which shows actions, outcomes and whether the case is



still open or closed.

More in depth guidance is available:

DfE: [Safeguarding and remote education during coronavirus \(COVID-19\)](#)

- o [Remote Learning Guidance for SLT](#)
- o [Remote Learning/Communication AUP](#)
- o [Online Safeguarding Resources for Educational Settings and Parents](#)

Welfare telephone calls will be made if no virtual face to face contact is made with a student.

### Confidentiality and Information Sharing

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (such as on a child in need or child protection plan).

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.

Staff should only discuss concerns with the designated safeguarding lead, head teacher, head of education or Directors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with General Data Protection Regulation (GDPR) and the [Data Protection Act 2018](#) principles.

Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

Staff should never promise a child that they will not tell anyone about a safeguarding matter. Indeed, where this is appropriate it may be helpful to the child to explain the information will be shared in order to keep them safe.

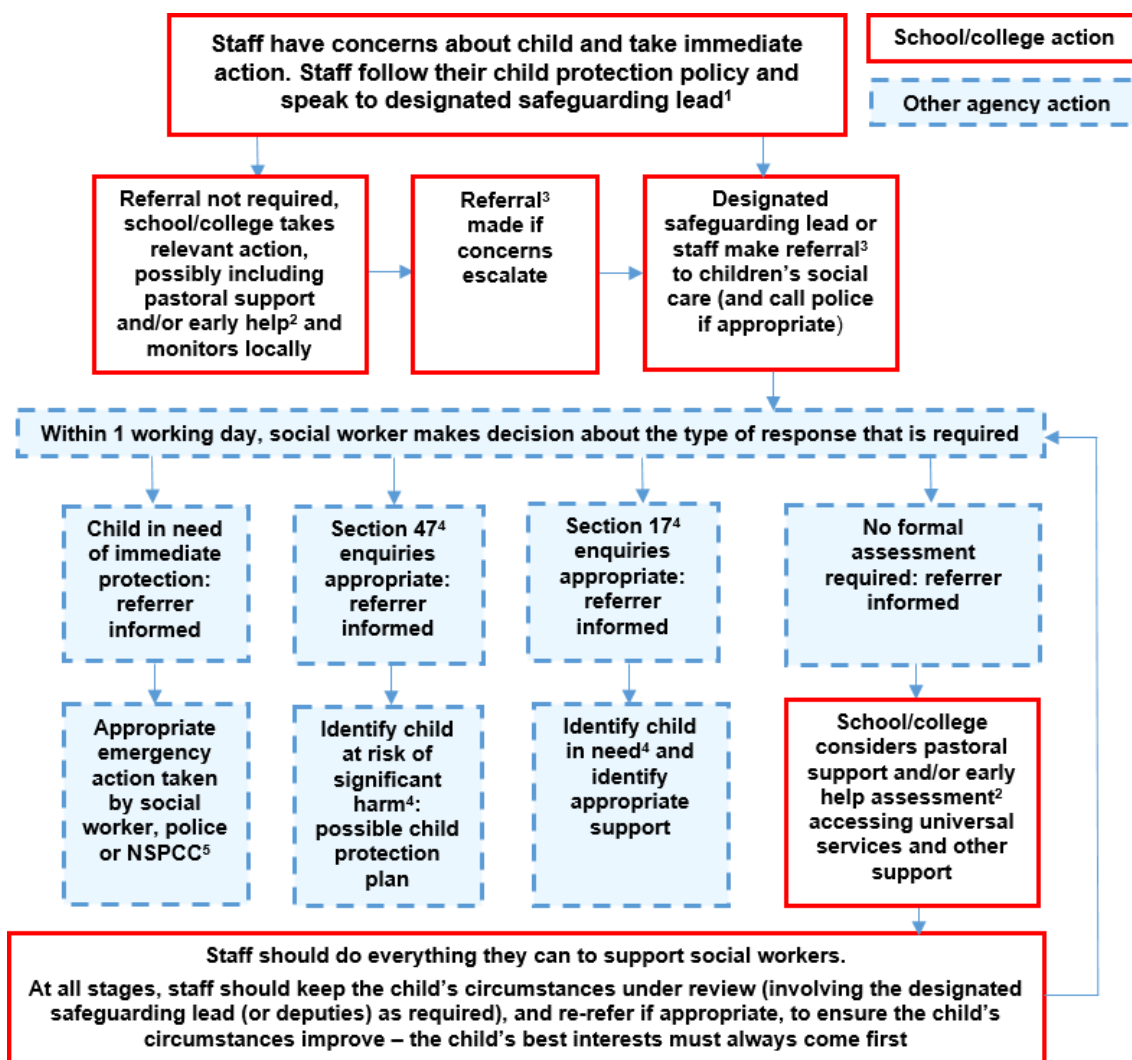
Record of concern forms and other written information will be carried out on clearcare and our school intranet system. Electronic information will be password protected and only made available to relevant individuals.

Every effort should be made to prevent unauthorised access to sensitive information. Child protection information will be stored separately from the child's school file.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

**Procedure if you have concerns about a child's welfare**

Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



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

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible.

### **If the concerns/allegations are about the headteacher**

If the concerns/allegations are about the headteacher, in the first instance go to the Head of Education, James Hall who will follow the required procedures. In his absence, speak to the Director of Children's Services, Nicci Willock. James Hall will liaise with the Director of Children's Services (on behalf of the Proprietor Body) and keep up to date with outcomes of the allegation.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the Head of Education or any member of staff is able to inform the local authority designated officer (LADO).

Please refer to our whistleblowing policy with regards to Safecall. **Safecall** is an independent confidential reporting service. Should an individual have concerns that they do not feel comfortable making directly to management, the individual is urged to make use of this facility. The call will not be audio recorded and all individuals can be assured that Safecall will treat the call confidentially.

Here at Five Rivers Child Care we all have a **responsibility to safeguard** our children in our care.

## **You can contact SafeCall on 0800 915 1571**

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

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

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

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

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

See appendixes for more information about child-on-child abuse.

## Procedures for dealing with allegations of child-on-child abuse

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

- › You must record the allegation on clearcare 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. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

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

To achieve this, we will:

- › Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- › Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- › Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- › Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- › Ensure staff reassure victims that they are being taken seriously
- › Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- › Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- › Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- › Ensure staff are trained to understand:

How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”

That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

- Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation
- A child's behaviour might indicate that something is wrong

That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it

That they should speak to the DSL if they have any concerns

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this

There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

### **Sharing of nudes and semi-nudes ('sexting')**

This is a suggested approach based on [guidance from the UK Council for Internet Safety](#) for [all staff](#) and for [DSLs and senior leaders](#).

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

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

Delete the imagery or ask the pupil to delete it

Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

Share information about the incident with other members of staff, the pupil(s) it involves or

their, or other, parents and/or carers

Say or do anything to blame or shame any young people involved

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

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- › Whether there is an immediate risk to pupil(s)
- › If a referral needs to be made to the police and/or children's social care
- › If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- › What further information is required to decide on the best response
- › Whether the image(s) 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 or videos from devices or online services
- › Any relevant facts about the pupils involved which would influence risk
- › assessment If there is a need to contact another school, college, setting or individual
- › Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

The incident involves an adult:

- ›
- › There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- › What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The imagery involves sexual acts and any pupil in the images or videos is under 13
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (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. The decision will be made and recorded in line with the procedures set out in this policy.

### **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 to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

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

### **Informing parents/carers**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through children's social care or dialling 101.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is

- > How it is most likely to be encountered

- > The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

- > Issues of legality

- > The risk of damage to people's feelings and

reputation Pupils also learn the strategies and skills

needed to manage:

- > Specific requests or pressure to provide (or forward) such

- > images The receipt of such images

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

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

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- > Ensure our reporting systems are well promoted, easily understood and easily accessible

for pupils

- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback



## Online Safety and the use of mobile technology

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

To address this, our school aims to:

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

### The 4 key categories of risk

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

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

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

- › Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- › Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- › Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- › Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- › Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- › Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- › Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- › Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- › Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

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

### Notifying parents or carers

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- › Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- › Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

### Pupils with special educational needs, disabilities or health issues

Our schools are Independent Special Schools, placing pupils with SEN/D and SEMH. We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. 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 condition without further exploration

- › Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
  - › The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
  - › Communication barriers and difficulties in managing or reporting these challenges
- Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy).

### Pupils with a social worker

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

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

Where we are aware that a pupil has a social worker, the DSL will request a copy of any plan (care plan, child protection plan, child in need plan) the child may be subject to and seek to participate in and assist with any planning that may be taking place to promote the child's safety and welfare.

### Children in care

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

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

### Safeguarding children who come from Black, Asian and minoritised ethnic communities

Many children and young people who come from Black, Asian and minoritised ethnic communities experience racism, bias, stereotyping or cultural misunderstanding as they grow up. It might happen at an individual, institutional or societal level and might be displayed consciously or unconsciously.

To make sure children from Black, Asian and minoritised ethnic communities get the help and support they need, the adults working or volunteering with them and their families need to:

- understand the challenges they face
- build trusting relationships
- take appropriate action to help keep children safe
- use a strength-based approach to empower parents and carers from Black, Asian and minoritised ethnic communities to take steps to keep their children safe.

We've pulled together learning from research evidence, case reviews and best practice guidance to help you mitigate racism and bias in your work with children and families from Black, Asian and minoritised ethnic communities.

This includes information on:

- bias and stereotypes
- anti-discriminatory practice
- communication and language barriers
- engaging with communities
- diversity, inclusion and empowerment in strategic decision making.

### Complaints and concerns about members of staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff

### Whistleblowing

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion – see the Whistleblowing policy

This means that staff should:

- report any behaviour by colleagues that raises concern.

All staff have a duty to report any child protection concerns to the Headteacher (if any staff are involved) or Designated safeguarding lead for child protection for child issues. They must never investigate situations themselves. This applies regardless of the relationship with the member of staff or the student. If staff do not report such an incident, they are putting themselves in a vulnerable situation. By observing incidents, which could be misconstrued, but not acting upon it, staff could be regarded as condoning the behaviour.

### Record Keeping

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

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

Records will include:

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

outcome Concerns and referrals will be kept in on our secure

Clearcare system Minutes will be taken weekly at our safeguarding meetings.

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

Safeguarding records relating to individual children

The file should be kept until the child is 25 (this is seven years after they reach the school leaving age) (Information and Records Management Society (IRMS), 2016). In some cases, records should be kept for longer periods but exceptions apply (see <https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines.pdf> – ‘Exceptions’ section).

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 as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

**5 days** for an in-year transfer, or within

- › **The first 5 days** of the start of a new term

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.

## Training

### All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be updated annually and will:

- › Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- › Be in line with advice from the 3 safeguarding partners
- › Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

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, including FGM, County Lines, as required but at least annually.

Volunteers will receive appropriate training, if applicable.

### 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.

### Senior staff at Five Rivers and the members of the Board

All receive training about safeguarding and child protection, which is regularly updated. This is to make sure that they:

- › Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- › Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

### Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix of this policy for more information about our safer recruitment procedures.

### Staff who have contact with pupils and families



## Appendixes

**These appendixes are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.**

### Appendix 1: types of abuse

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

- › Ensure adequate supervision (including the use of inadequate
- › caregivers) Ensure access to appropriate medical care or treatment

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



## Appendix 2: Safer Recruitment

**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 recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education. To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

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

### **Advertising**

When advertising roles, we will make clear:

- › Our school's commitment to safeguarding and promoting the welfare of children That safeguarding checks will be undertaken
- › The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- › Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

### **Application forms**

Our application forms will:

- › Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- › Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- › require applicants to provide a full employment history and to explain any gaps in their employment. This history and any gaps will be explored during the interview process

### **Shortlisting**

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

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

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

- › Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information

› Sign a declaration confirming the information they have provided is true  
 We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

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

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

When seeking references we

- › will: Not accept open references
- › Liaise directly with referees and verify any information contained within references with the referees
- › Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- › Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- › Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- › Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- › Resolve any concerns before any appointment is confirmed

### **Interview and selection**

When interviewing candidates, we will:

- › Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- › Explore any potential areas of concern to determine the candidate's suitability to work with children
- › Record all information considered and decisions made

### **Pre-appointment vetting checks**

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

### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- › Verify their identity
- › Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- › 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. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- › 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

\* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

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.

### **Existing staff**

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

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

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

- › We believe the individual has engaged in [relevant conduct](#); or

- › We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- › We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- › The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

#### **Agency and third-party staff**

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

#### **Contractors**

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

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

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

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

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

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

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

#### **Trainee/student teachers**

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

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

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

## **Volunteers**

We will:

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

## **Board Members**

All Board Members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. All board members will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor). The chair of the board will have their DBS check countersigned by the secretary of state. All members of the Board will also have the following checks:

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

The chair of the board will have their DBS check countersigned by the secretary of state. All governors will also have the following checks:

- › Identity
- › Right to work in the UK
- › Other checks deemed necessary if they have lived or worked outside the UK

## **Staff working in alternative provision settings**

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

## **Adults who supervise pupils on work experience**

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

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

### Appendix 3: allegations of abuse made against staff

#### **Section 1: allegations that may meet the harms threshold**

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

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- › Behaved in a way that has harmed a child, or may have harmed a child,
- › and/or Possibly committed a criminal offence against or related to a child, and/or
- › Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- › Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult with the local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be decided by the head of education, or the proprietor where the Head of Education is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there 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/carers have been consulted
- › Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for Five Rivers.

If in doubt, the case manager will seek views from the school's personnel adviser and the

designated officer at the local authority, as well as the police and children's social care where they have been involved.

### Definitions for outcomes of allegation investigations

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

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- › Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- › Discuss the allegation with the 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
- › Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- › **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. 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 (only in relation to their child – no information will be shared regarding the staff member)
- › Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency. Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

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

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

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

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

#### **Timescales**

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

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

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

### **Specific actions**

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

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

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

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

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

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

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

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

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

If a report is:

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

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

If an allegation is:

- › Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- › Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

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

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

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

### **Record-keeping**

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

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

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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

### **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated
- › or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

- › Include substantiated allegations, provided that the information is factual and does not include opinions

### **Learning lessons**

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

This will include consideration of (as applicable):

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

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

### **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

### **Section 2: concerns that do not meet the harm threshold**

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

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

Concerns may arise through, for example:

- Suspicion
- › Complaint
- › Safeguarding concern or allegation from another member of staff
- › Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

### **Definition of low-level concerns**

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

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

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

- › Being overly friendly with children
- › Having favourites
- › Taking photographs of children on their mobile phone
- › Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- › Humiliating pupils

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

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

We will create this culture by:

- › Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- › Empowering staff to share any low-level concerns as per section 7.7 of this policy
- › Empowering staff to self-refer
- › Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- › Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- › Helping to identify any weakness in the school's safeguarding system
- › Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

### **Record keeping**

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

Records will be:

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

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

## References

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

- › The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- › The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## Children missing from education

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

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

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

Many children educated in Five Rivers Schools have previously had difficulties with school attendance. They may have had poor experiences in their previous schools and may need support to improve their school attendance...

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education and recognize that this may overlap with risks associated with abuse and neglect.

Staff are trained to recognise potential safeguarding concerns which are associated with being missing from school. In line with these procedures, if a member of staff suspects a child is at risk of harm, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Indicators of CCE can include a child:

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

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

### Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a

- › child: Having an older boyfriend or girlfriend



- › Suffering from sexually transmitted infections or becoming pregnant

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.

### **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

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

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy. Sections 7.8 and 7.9 above set out our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced abuse and trauma, and we will offer them appropriate support.

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.



Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances. If a child discloses having witnessed domestic abuse, we will trigger a safeguarding response as described in this policy.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

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

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

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

### **FGM**

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

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

Indicators that FGM has already occurred include:

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

safeguarding issues A girl:

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

legs Potential signs that a pupil may be at risk of FGM

include:

- › The girl's family having a history of practising FGM (this is the biggest risk factor to consider) FGM being known to be practised in the girl's community or country of origin
- › A parent or family member expressing concern that FGM may be carried out
- › A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- › A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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 '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

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

### **Children who are lesbian, gay, bi, or trans (LGBT).**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

### **Extra Familial harm (Contextual safeguarding) – risks that lie outside of the home**

Contextual Safeguarding has been developed by Carlene Firmin at the University of Bedfordshire over the past six years to inform policy and practice approaches to safeguarding adolescents. Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Therefore, children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

### **Preventing radicalisation**

- › **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- › **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

**Terrorism** is an action that:

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

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

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

Our IT department ensures that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

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

## Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can

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

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

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

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

When supporting victims, staff will:

- › Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- › Regularly review decisions and actions, and update policies with lessons learnt
- › Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- › Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- › Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

Challenging inappropriate behaviours

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

## Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- › Increased absence from school
- › Change in friendships or relationships with older individuals or groups

- › Significant decline in performance
- › Signs of self-harm or a significant change in wellbeing
- › Signs of assault or unexplained injuries
- › Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include: Being male

- › Having been frequently absent or permanently excluded from school
- › Having experienced child maltreatment
- › Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.