

Education
Child
Protection
and
Safeguarding
Policy &
Procedure

Five Rivers is committed to Working Together to Safeguard Children and young people and expects all staff and volunteers to share this commitment'

| Policy Owner | Head Teacher |
|------------------------|-----------------------|
| Authoriser | Director of Education |
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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

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

| Term | Definition |
|---|--|
| Working together to Safeguard Children | Protecting children from maltreatment |
| | Preventing impairment of children's mental and physical health or development |
| | Ensuring that children grow up in circumstances consistent with the provision of safe and effective care |
| | Taking action to enable all children to have the best outcomes |
| Child protection | Is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. |
| Abuse | 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. |
| Sharing of nudes and semi-nudes | (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. |
| Children | Includes everyone under the age of 18. |

| Victim | 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. |
| Alleged perpetrator(s) and | Are widely used and recognised |
| perpetrator(s) | 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

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.

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

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).

1.5 Further Information

This policy is based on the Department for Education's statutory guidance <u>Keeping</u>
<u>Children Safe in Education</u> and <u>Working Together to Safeguard Children (2023)</u>, and the <u>Governance</u>

<u>Handbook</u>. 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 <u>Education Act 2002</u>, 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 <u>Education (Independent School Standards) Regulations</u>
 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 <u>Non-Maintained Special Schools (England) Regulations</u> <u>2015</u>, 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 <u>Serious Crime Act 2015</u>, 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 <u>Safeguarding Vulnerable Groups Act 2006</u>, 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

Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK (www.gov.uk)

Meeting digital and technology standards in schools and colleges updated March 2023.

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

1.5 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 (SEND) 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

2. Procedure

2.1 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

2.2 If a child makes a disclosure to you – BE THE PROFESSIONAL YOU WOULD HAVE NEEDED

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 barriers
- None 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 Director 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.

2.3 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)

Speak to the DSL and record on Clearcare. Follow up via email to the DSL group,

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, Director 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 have taken with the DSL as soon as practically possible.

2.4 Early help assessment

Early recognition is everything and will always lead to early help and early intervention. 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.

2.5 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.

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.

Ensure you professionally challenge in writing if needed and do not tolerate victim blaming. How we speak and the language used, does matter – choose your language carefully verbally and in writing.

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 <u>National Police Chief's Council guidance</u> on when to call the police to ensure that calls are appropriate and timely.

2.6 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.

2.7 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. 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

2.8 If you have a concern regarding a pupils mental health

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 have 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 <u>mental health and behaviour in schools</u> for more information.

2.9 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 Support 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
 - o 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

2.9.1 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, <u>Keeping Children Safe in Education</u>, 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.

2.9.2 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

2.9.3 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).
- o 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 Director 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 be kept up to date with updated guidance and relevant training.

2.9.4 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

3. Site Security

All employees have an ID badge. All employees must sign in when entering the school and sign out when leaving the premises.

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.

4. 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:

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

5. 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 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 an Incident report form (held on Clear Care). These will be sent to the Director 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.

6. 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

6.1 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 - 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

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.

6.2 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.

If the pupil is on roll at a school, this should be reported to their DSL for follow up. 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)

Remote Learning Guidance for SLT

Remote Learning/Communication AUP

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.

7. 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 Director 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 <u>Data Protection Act 2018</u> 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.

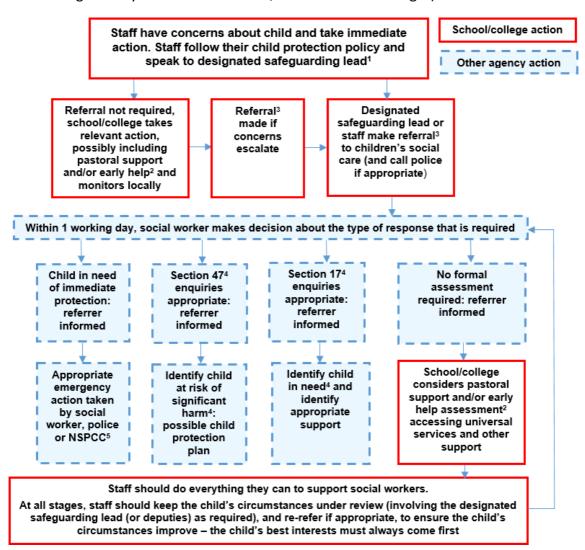
Record of concern forms and other written information will be carried out on clearcare and our school intranet system. Electronic information will be password protected and only made available to relevant individuals.

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.

8. 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)



9. 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.

9.1 If the concerns/allegations are about the headteacher

If the concerns/allegations are about the headteacher, in the first instance go to the Director of Education, James Hall who will follow the required procedures. In his absence, speak to the Chief Executive Officer, Nicci Willock. James Hall will liaise with the CEO (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 Director of Education or Education Advisor to the Board.

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

10. 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.

10.1 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.

10.2 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-onchild 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
- o A member of staff may overhear a conversation
- o 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

11. Financially motivated sexual extortion (sometimes referred to as 'sextortion')

There has been an increase in reporting of children and young people, particularly teenage males, being forced into paying money or meeting another financial demand after an adult offender has threatened to release nudes or semi-nudes of them. This is financially motivated sexual extortion, sometimes referred to as 'sextortion', and is a form of child sexual abuse.

The National Crime Agency has issued an alert to education settings, with advice on how to:

- o recognise the signs of financially motivated sexual extortion
- o raise awareness and support children to seek help
- support victims of sextortion
 nca_financially_motivated_sexual_extortion_alert_education_eng.pdf
 (thinkuknow.co.uk)

12. 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.

12.1 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.

12.2 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

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- > 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.

12.3 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.

12.4 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.

12.5 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.

12.6 Recording incidents

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

12.7 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.

12.8 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

13. 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:

- o 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 <u>Educate Against Hate</u> and charity <u>NSPCC</u> 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.

14. 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

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

Educate pupils about online safety as part of our curriculum. For example:

- o The safe use of social media, the internet and technology
- o Keeping personal information private
- o 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
- > Five Rivers also obtains a cyber certificate that is renewed annually to meet standards
- > 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.

15. 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)

16. 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.

17. 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:

o 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.

18. 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 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.

18.1 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.

19. Training

19.1 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:
 - o Manage behaviour effectively to ensure a good and safe environment
 - o 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, Self Harm and many other safeguarding relation training.

19.2 The DSL and deputies

The DSL and deputies will undertake Level 3 DSL 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.

19.3 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

19.4 Staff who have contact with pupils and families

All staff who have contact with children and families have clinical support, coaching and training to allow for confidential discussions of sensitive issues.

20. Monitoring Arrangements

This policy will be reviewed **annually** by the Director of Education. At every review, it will be approved by the Board.

21. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- > Staff code of conduct
- Complaints
- Health and safety
- > Attendance
- Online safety
- > Relationships and sex education
- First aid
- Curriculum
- Privacy notices
- > Safer Recruitment policy
- > References policy
- Disciplinary policy