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# GLEBE PRIMARY SCHOOL
# UNITED LEARNING ACADEMY

# Safeguarding Children & Child Protection Policy & Procedures

# 2023-2024

**Updated: Autumn 2023**
**New Review: Summer 2024**

Approved by the Local Governing Board on 6th February 2024

Signed by: Mr. James Dempster
Position: Chair of the Local Governing Body

## UNITED LEARNING SAFEGUARDING CHILDREN AND CHILD PROTECTION POLICIES AND PROCEDURES

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| Date of last central office review: | New to ULT – Nov 2023 | Review Period: | 1 year (minimum) |
| Date of next central office review: | 1st September 2024 | Owner: | Darran Ellison-Lee |
| Date of next school level review: | 1st September 2024 | | |
| Type of policy: | United Learning Policy | Local Governing Body | Recommends school policy for Group Board approval |
| | | Group Board: | Group Board approves United Learning Policy |

**REVIEW TIMETABLE**

| The Policy will be reviewed annually, as set out below: | |
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| Policy reviewed centrally | July 2023 |
| Policy tailored by individual schools | Nov 2023 |
| Policy ratified by Local Governing Bodies | Dec 2023 |
| Policy approved by the Group Board | July 2023 |
| Implementation of Group Policy | Sept 2023 |

# UNITED LEARNING TRUST GLEBE PRIMARY SCHOOL

# CHILD PROTECTION AND SAFEGUARDING POLICY

## 31st October 2023

**KEY EXTERNAL CONTACT DETAILS**

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|---|---|
| **Local Authority Designated Officer** | Donna Tomlinson and Miriam Williams<br>TEL: 0330 222 6450<br>EMAIL: LADO@westsussex.gov.uk |
| **Local Authority Children's Social Services** | TEL: 01403 229900<br>EMAIL: wschildrenservices@westsussex.gov.uk<br>OUT OF HOURS EMERGENCY: 033 022 26664<br>DUTY TEAM TEL: 033 022 26664 |
| **Multi-Agency Safeguarding Hub** | TEL: 01403 229900<br>EMAIL: wschildrenservices@westsussex.gov.uk |
| **Support and Advice about Extremism** | **Police**<br>Sussex Police Prevent team<br>TEL: 101 EXT 531355<br>EMERGENCY: 999<br>NON-EMERGENCY NUMBER: 101<br>EMAIL: prevent@sussex.police.uk<br><br>**Local Authority**<br>Community Safety and Wellbeing, WSCC<br>TEL: 0330 222 4223 \| Mobile 0789 458 9071<br>EMAIL: beverly.knight@westsussex.gov.uk<br>PREVENT LEAD: Beverly Knight<br><br>**Department for Education**<br>NON-EMERGENCY NUMBER: 020 7340 7264<br>EMAIL: counter.extremism@education.gov.uk<br>CONTACT FORM:<br>https://report-extremism.education.gov.uk/ |
| **NSPCC's what you can do to report abuse dedicated helpline** | TEL: 0808 800 5000<br>EMAIL: help@nspcc.org.uk |
| **Disclosure and Barring Service** | **Disclosure Service**<br>ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom<br>TEL: 03000 200 190<br>EMAIL: customerservices@dbs.gov.uk |

| | Barring Service<br>ADDRESS:  DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom<br>**TEL:**  03000 200 190 |
|---|---|
| **Teaching Regulation Agency** | TEL: 0207 593 5393<br>EMAIL: misconduct.teacher@education.gov.uk |
| **OFSTED (Concerns)** | TEL: 0300 123 4666<br>EMAIL: CIE@ofsted.gov.uk |

**KEY SCHOOL CONTACT DETAILS**

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|---|---|
| **United Learning Trust (ULT)** | **Chair of ULT**<br>Dame Reena Keeble<br>EMAIL: company.secretary@unitedlearning.org.uk<br><br>**Head of Safeguarding**<br>Darren Ellison-Lee, Director of Primary Education<br>EMAIL: Darran.ellison-lee@unitedlearning.org.uk<br><br>**Regional Director (United Learning)**<br>Claire Fortey TEL: 07718 422702<br>EMAIL: claire.fortey@unitedlearning.org.uk<br><br>**UL Safeguarding Lead**<br>Frazer Smith<br>TEL: 07826934336<br>EMAIL: frazer.smith@unitedlearning.org.uk |
| **Local Governing Body (LGB)** | **Chair of LGB**<br>James Dempster<br>TEL: 01273 592163<br>EMAIL: James.Dempster@glebeprimary.co.uk<br><br>**Nominated Safeguarding Governor of LGB**<br>Jo Findlay<br>TEL: 01273 592163<br>EMAIL: jo.findlay@glebeprimary.co.uk<br><br>**Nominated E-Safety Governor of LGB**<br>James Eaton and Lim Phoon<br>TEL: 01273 592163<br>EMAIL: james.eaton@glebeprimary.co.uk<br>lim.phoon@glebeprimary.co.uk |

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| **Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Leads (DDSLs)** | **Main DSL for the School**<br>Casey Groves<br>TEL: 01273 592163<br>EMAIL: dsl@glebeprimary.co.uk<br><br>**Deputy DSL**<br>Jo Gravestock<br>TEL: 01273 592163<br>EMAIL: jo.gravestock@glebeprimary.co.uk<br><br>**Deputy DSL**<br>Clare Jackson<br>TEL: 01273 592163<br>EMAIL: clare.jackson@glebeprimary.co.uk<br><br>**Deputy DSL**<br>Karen Crutchfield<br>TEL: 01273 592163<br>EMAIL: head@glebeprimary.co.uk<br><br>**Deputy DSL**<br>Martha Williams<br>TEL: 01273 592163<br>EMAIL: martha.williams@glebeprimary.co.uk<br><br>**EYFS DSL**<br>Casey Groves<br>TEL: 01273 592163<br>EMAIL: dsl@glebeprimary.co.uk<br><br>**Designated E-Safety Lead**<br>Karen Crutchfield<br>TEL: 01273 592163<br>EMAIL: head@glebeprimary.co.uk |
| **Designated Teachers for Looked After Children** | Clare Jackson<br>TEL: 01273 592163<br>EMAIL: clare.jackson@glebeprimary.co.uk |
| **Head/Principal** | Karen Crutchfield<br>TEL: 01273 592163<br>EMAIL: head@glebeprimary.co.uk |

**POLICY STATEMENT**

This policy applies to Glebe Primary School, ("the school") which includes the EYFS setting]. United Learning Trust requires the School's Local Governing Body to review and update this policy annually (as a minimum). This policy is available on the school website  This policy is ratified annually by the United Learning Group Board.

This policy has regard to the following guidance and advice, as amended from time to time (and any supplemental guidance/advice referred to therein):

- Keeping Children Safe in Education Sept 2023(DfE, 2023)
- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, 2015)
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (December 2020)
- Mental Health and Behaviour in Schools (DfE, November 2018)
- Preventing and Tackling Bullying (DfE, July 2017)
- Working Together to Safeguard Children (DfE, Current edition/publication)
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018)
- Revised Prevent Duty Guidance: for England and Wales (Home Office, April 2021)
- Protecting children from radicalisation: the prevent duty - Guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism (DfE, updated August 2015)
- Relationships education, relationships and sex education (RSE) and health education (DfE, updated September 2021)
- Statutory Framework for the Early Years Foundation Stage (DfE, updated September 2021)
- National Minimum Standards for Boarding Schools (DfE, 2022)
- Equality Act (2010) – Including Public Sector Equality Duty
- The Human Rights Act (1998)

This policy also takes into account the procedures and practice of West Sussex County Council and the published safeguarding arrangements set out by the West Sussex Safeguarding Children Partnership - wsscp@westsussex.gov.uk The Local Governing body, and their senior leadership teams, especially their designated safeguarding leads, will:

- make themselves aware of and follow their local arrangements (including the local criteria for action and the local protocol for assessment)
- ensure this is reflected in their own policies and procedures
- supply information as requested by the three safeguarding partners
- work with social care, the police, health services and other services to promote the welfare of children and protect them from harm

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests** of the child. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

The school will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Staff working with children should have an attitude of '**it could happen here**' and no reports in their school it does not mean it is not happening. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern the school will ensure the child's wishes and feelings are taken into

account when determining what action to take and what services to provide.   Systems are in place for children to express their views and give feedback.

**CONCERNS ABOUT A CHILD**

The school always has a duty to consider the best interests of the student and take action to enable all students to achieve the best outcomes.  Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The school has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements are

Staff should expect to support social workers and other agencies following any referral.

**Definitions of Safeguarding and Types and Signs of Abuse**

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse, exploit, or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, by other children, or, more rarely, by others (e.g. via the internet).

Technology is a significant component in many safeguarding and well-being issues.  Abuse can take place wholly online, or technology may be used to facilitate offline abuse.  In many cases abuse will take place concurrently via online channels and in daily life. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

All staff should be aware of indicators of abuse and neglect.  Staff are referred to **Appendix 1** of this policy for further detail of the types of abuse and possible signs of abuse.  Staff should always be vigilant and raise any concerns with the DSL or DDSL.

**PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

If staff suspect or hear an allegation or concern of abuse or neglect from a child or any third party, they must follow the relevant procedure below, all staff should:

- listen carefully;
- avoid asking leading questions;
- reassure the individual that the allegation/complaint will be taken seriously;
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to;
- a victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

**All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should 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.

Incidents should be recorded on CPOMS; they should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where a report includes online elements or the sharing of images, staff are **reminded not to view or forward any illegal images** of a child but note what has been reported. Further guidance can be found in the Sharing nudes and semi-nudes: advice for education settings working with children and young people".

Where there is a safeguarding concern, the school will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. The school manages this by putting systems in place for children to express their views and give feedback and the provision in place to support dialogue with students with communications difficulties or vulnerabilities.

**Information sharing:** Safeguarding information will often be special category personal data and the school will comply with data protection law and have due regard to the Department for Education's guidance 'Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers' (2018), and the relevant provisions of KCSIE when sharing such data. Personal information may be shared by the school with a third party (such as the police or local authority) without consent if there is a lawful basis to do so such as where doing so is in order to

promote a child's welfare or where their safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent in certain circumstances. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The school operates its processes with the best interests of the student at its heart.

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. The school will ensure relevant staff comply with the relevant data protection principles when processing and sharing personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. As part of this, the school will ensure that members of staff:

- are confident of the processing conditions which allow them to process and share information for safeguarding purposes, including information which is 'special category personal data'.
- understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent in certain circumstances.
- Do not provide pupils' personal data where the sharing does not comply with data protection law.

When sharing information staff will ensure they comply with group data protection policies and keep records of disclosures as required by these policies. These are available to staff via the United Learning Policies Portal. For further information about how the school processes pupil personal data, please see the privacy notice on the school's website, www.glebeprimary.co.uk.

**What staff should do if they have concerns about a child**

If staff (including governors, agency staff and volunteers) have any concerns about a child's welfare they should act immediately and should speak with the School's DSL or DDSLs. If, in exceptional circumstances, the DSL or DDSLs are not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the threshold document published by the school's local safeguarding partners. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- making an early help assessment; or
- making a referral for statutory services and / or
- making a referral to the police.

If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

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). Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing (in line with this policy).

**Early Help**

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

- Has a disability or has certain health conditions and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan);
- Has a mental health need;
- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- Is frequently missing/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- Is at risk of being radicalised or exploited;
- Has a family member (carer/guardian) in prison, or is affected by parental offending;
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse;
- Has returned home to their family from care;
- Is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage;
- Is a privately fostered child.
- Is persistently absent from education, including persistent absences for part of the school day.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a student may benefit from early help should discuss this with the School's DSL or DDSL. If early help is appropriate, the DSL will generally lead on liaising with relevant agencies and setting up inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. The DSL will support staff in liaising with external agencies and professionals in an inter-

agency assessment, as appropriate. If early help is appropriate, the matter will be kept under constant review and consideration given to a referral to children's social care if the student's situation does not appear to be improving or is getting worse.

**What staff should do if a child is suffering, or is likely to suffer from harm**

If staff (including governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is important that an **immediate** referral to local authority's children's social care (and the Police if appropriate) is made in accordance with the local authority referral process.  Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.  Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important to provide as much information as possible as part of the referral process, to enable a contextual approach (see further below re Contextual Safeguarding).

The school's local safeguarding partners are West Sussex County Council, West Sussex Clinical Commissioning Group and the Chief Constable of Sussex Police and the locally agreed safeguarding arrangements can be found at https://www.westsussexscp.org.uk/

**What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism, they must call 999 or the Integrated Front Door (IFD).  Advice and support can also be sought from children's social care.

The school, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL Team and governors responsible for safeguarding to ensure the school's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

See further below for more information on radicalisation.  Further guidance can be found in the Revised Prevent duty guidance: for England and Wales April 2021.

**What staff should do if they discover an act of Female Genital Mutilation ('FGM')**

All staff should speak to the DSL or DDSLs about any concerns about FGM. Teaching staff have a separate duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

**What staff should do if a child goes missing from Education/Children Absent from Education**

Children missing/absent from education, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in

future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures. The school's procedures for unauthorised absence and for dealing with children who go missing/absent from education are outlined in the Attendance Policy and we work in partnership with the West Sussex Children Missing in Education department to report and follow up on any concerns. Further detail can also be found at Appendix 1 of this policy.

The school will report to West Sussex County Council a student who fails to attend school regularly or has been absent from school without the school's permission for a continuous period of 10 school days or more.

**Elective Home Education**

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will try to work together with the local authority and key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. The school will inform the local authority of all deletions from the admissions register when a child is taken off roll.

**What staff should do if they have concerns about another staff member (including supply staff, volunteers and contractors)**

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this should be referred to the Head teacher. Where there are concerns/allegations about the Head teacher this should be referred to the Chair of the LGB and Head of Safeguarding. In the event of concerns/allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, volunteers and contractors).

**What staff should do it they have concerns about safeguarding practices in the school**

Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these should be raised in accordance with the school's whistleblowing procedures which can be found on the school's website (www.glebeprimary.co.uk). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the school, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

**CHILD-ON-CHILD ABUSE (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARRASSMENT)**

Safeguarding issues can manifest themselves via child-on-child abuse. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between two or more children and within children's relationships (both intimate and non-intimate). All staff working with children are advised to maintain an attitude of "it could happen here". Staff should recognise that even if there are no reports, it does not mean that child-on-child abuse is not happening, it may be the case that it is just not being reported

This is most likely to include, but may not be limited to:

- Abuse in intimate personal relationships between children;
- Bullying (including cyberbullying);
- 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, jokes and online sexual harassment, or misogynistic messages which may be stand alone or part of a broader pattern of abuse;
- The non-consensual sharing of indecent images*, especially around chat groups, and the sharing of abusive images, nudes, videos and pornography to those who do not want to receive it (see further below);
- 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;
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

The school recognises the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be "victims" and boys "perpetrators").  Even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. As such, if staff have **any** concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy).

Child-on-child abuse can be associated with factors outside the school and can occur online and face-to-face between two or more children of any age or gender. The school therefore takes a contextual safeguarding approach to managing child-on-child abuse.

Child-on-child abuse is abuse and is never acceptable. The school takes a zero-tolerance approach. It should never be passed off or dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys".

The school takes the following steps to minimise the risk of child-on-child abuse. All children affected by peer-on-peer abuse will be supported by the school's pastoral team and support from external agencies will be sought, as appropriate.  'Victims' will be reassured that they are being taken seriously and that they will be supported and kept safe.  The school recognises that children with special educational needs and disabilities can be more prone to child-on-child group isolation than other children and will consider extra pastoral support for them.  This could include support from the Thrive Team.

The school's approach to pupil's sharing nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery) is above. Further guidance can be found in the UKCIS Sharing nudes and semi-nudes: advice for education settings guidance.

Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies in the first instance:

**What to do if staff suspect that a child may be at risk or hears a report of child-on-child abuse**

For detailed information on what sexual violence and sexual harassment constitutes, important context to be aware of, related legal responsibilities for schools and colleges, advice on a whole school or college approach to preventing child-on-child sexual violence and sexual harassment and more detailed advice on responding to reports see the Department for Education's statutory guidance: *Keeping Children Safe in Education (2022), Part 5 – Child-on-child sexual violence and sexual harassment*

The procedures set out below have been developed following consultation with students, staff and parents and will be reviewed, at least annually, in light of an assessment of the impact and effectiveness of the policy.

The school's initial response to a report from a child is important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online should not be downplayed and should be treated seriously. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told.

All staff are trained to manage a report. Effective safeguarding practice includes:

> • if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;

> • not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are

necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

• recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;

• recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can memory and so children may not be able to recall all details or timeline of abuse;
• keeping in mind that certain children may face additional barriers to telling someone because of their disability, sex, ethnicity and/or sexual orientation;

• listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

• considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;

• only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;

• where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS guidance on Sharing nudes and semi-nudes: advice for education settings working with children and young people.

• informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

If a staff member has a concern that a child may be at risk of or experiencing abuse by another child, or that a child may be at risk of abusing or may be abusing other children, they should discuss their concern with the DSL or DDSLs without delay so that a course of action can be agreed.

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The school treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and

the child who has allegedly been responsible for it. **Immediate** consideration will therefore be given as to how best to support and protect all children involved/impacted.

The school will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The school should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by either a member of the DSL team or the Thrive team and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. The school recognises that children with special educational needs and disabilities or certain health conditions can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children, using the skills and knowledge of the Thrive team.

A student against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from relevant local safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the relevant local safeguarding partners, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the relevant local safeguarding partners, such as children's social care and/ or the Police as appropriate.

**Reports concerning harmful sexual behaviour (including sexual violence and sexual harassment)**

Consideration of safeguarding all those children involved in the safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response.  Important considerations  will include:

- o   The wishes of the victim in terms of how they want to proceed;
- o   The nature of the alleged incident, including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed;
- o   The ages of the children involved;
- o   The developmental stages of the children involved;
- o   Any power imbalance between the children (e.g. is/are the alleged
- o   perpetrator(s) significantly older, more mature, confident and well known social
- o   standing? Does the victim have a disability or learning difficulty);
- o   If the alleged incident is a one-off or sustained pattern of abuse (NB. sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- o   That sexual violence and sexual harassment can take place within intimate personal relationships between children;
- o   Any ongoing risks to the victim, other children, adult students, or school/college staff;
- o   Importance of understanding intra familial harms and any necessary support for siblings following incidents;
- o   Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

When there has been a report of sexual violence, the DSL (or a deputy DSL) should make an immediate risk and needs assessment in respect of each child affected by the abuse. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the "victim";
- the alleged "perpetrator"; and
- the other children (and, if appropriate, staff) at the school.

The DSL will consider as part of the school's response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review.  The DSL will consider the risks posed to all students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the "victim" and alleged "perpetrator" and considerations regarding shared classes, sharing school premises and school transport. Any professional risk assessment will inform the school's approach.

The police will be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police.  A report to the police will generally be made in parallel with a referral to children's social care.

If the DSL decides to make a referral to children's social care and/or a report to the police against a "victim's" wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL or DDSLs will also work closely with children's social care and other agencies are required to ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and children's social care to ensure the welfare and safety of all children and update the risk assessments and ensure relevant protections and measures are in place for all children.

The school will consider whether disciplinary action may be appropriate for any child/children involved.  Before deciding on appropriate action the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

The DSL will ensure that where children move to another educational institution following an incident of child-on-child abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

The school recognises that good record-keeping and monitoring of sexual violence and sexual harassment reports is essential and assists the school in meeting its Public Sector Equality Duty.

**Contextual Safeguarding**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All

staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

## SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

The school's procedures for managing concerns/ allegations against staff who are currently working in the school follows Department for Education statutory guidance and local safeguarding partners' arrangements and applies when staff (including supply staff, volunteers and contractors) have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student; and/or
- Possibly committed a criminal offence against or related to a student; and/or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside school, that might make them unsuitable to work with children "transferable risk". Advice can be sought from the LADO in assessing transferable risk).

### Non-recent allegations

Allegations against an adult that is no longer working/volunteering with children should be referred to the Police. Where it is known that the adult is still working/volunteering with children, all allegations (including historical/non-recent allegations of abuse) should be referred to the Police and the LADO in the local authority that the adult is working/volunteering.

Where an adult makes an allegation to a school that they were abused as a child, they should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the school may discuss informally with the Local Authority 'designated officer' (LADO) on a no-names basis (if local safeguarding procedures allow).

All allegations should be investigated as a priority to avoid any delay.

### Allegations that may meet the harms threshold

1. All allegations which appear to meet the above reporting criteria are to be **reported straight away to the 'case manager'** who is the Headteacher Where the Headteacher is absent or is the subject of the allegation or concern, reports should be made to Chair of the LGB and Head of Safeguarding. Where the Headteacher is the subject of the allegation or concern, the Headteacher must not be informed of the allegation prior to contact with Chair of the LGB, Head of Safeguarding and LADO, and if appropriate, children's social care and the police.

2. **Welfare of the child:** Where the case manager deems that a child has been harmed, or there to be an immediate risk of harm to a child, or if the situation is an emergency, the DSL (or DDSL) should contact Children's Social Care and, as appropriate (e.g. if there is evidence of a possible criminal offence), the Police immediately.

3. **Investigating and supporting the person subject to the allegation:** Before contacting the LADO, schools should conduct <u>basic</u> enquiries in line with local procedures to establish the facts and help determine if there is any foundation to the allegation, being careful not to jeopardise any future police investigation, such as:
   - Was the individual in the school at the time of the allegation?
   - Could they have come into contact with the child?

   Schools should establish what initial information the LADO will require, and if in doubt check with the LADO before undertaking any initial enquiries, to ensure not to prejudice the position.

4. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. The designated officer should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

5. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed with the Police/LADO. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

6. **Suspension:** The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, their HR adviser, as well as the police and children's social care if relevant when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the school and shall provide them with their contact details.

7. **Support for the member of staff:** whilst the welfare of the child is paramount, appropriate welfare support should also be made for the member of staff. Information is confidential, and should not ordinarily be shared with other staff, children or parents not directly involved. See further guidance in KCSIE.

8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.

9. **Further investigation:** where further investigation is required, the LADO and case manager will agree how and by whom the further investigation will be undertaken.

10. The case manager will discuss with the designated officer whether a referral to the **Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency (TRA)** should be made, noting the requirements of KCSIE. For instance:

a. If: 1) the allegation is substantiated; and 2) the person is dismissed (including by an agency) or the school (or agency) ceases to use their services, or the person resigns or otherwise ceases to provide their services, then the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

b. The employer has a legal requirement to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
    i. engaged in relevant conduct in relation to children and/or adults,
    ii. satisfied the harm test in relation to children and/or vulnerable adults; or
    iii. been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

c. In a case involving serious professional misconduct by a teacher, the case manager must consider whether to make a referral to the TRA. In certain cases, the TRA will consider whether to prohibiting the individual from teaching.

11. Where the initial discussion leads to no further action, the case manager and the LADO should record the decision and justification for it; and agree on what information should be put in writing to the individual concerned and by whom.

12. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designate officer and case manager should consider how future investigations of a similar 98 nature could be carried out without suspending the individual.

13. For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the designated officer) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

14. **Settlement:** Compromise or settlement agreements **should not** be used where there are allegations which indicate the person poses a risk of harm or may not be suitable to work with children and will not prevent police and/or school investigation, or referral to the DBS or TRA where the criteria are met. Failure to do so is a criminal offence. The school will continue its investigation if the person leaves, resigns or ceases to provide their services. Schools should check the relevant provisions of KCSIE.

**Information sharing**

Staff should be mindful of the guidance set out in KCSIE in relation to sharing information between safeguarding partners during the course of the process of managing allegations against staff.

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

**Allegation outcomes**

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions (KCSIE). Low level concerns (see below) should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance (KCSIE).

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

If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it in accordance with the school's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

**Supply teachers and all contracted staff**

Where the school has to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency'), they will ensure allegations are dealt with properly. They will liaise with the local authority designated officer (LADO) to determine a suitable outcome and discuss with the agency whether it is appropriate to suspend the supply teacher or redeploy them to another part.

Agencies should be fully involved and cooperate with any enquiries from the LADO, police and/or children's social care. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

When using an agency, the schools will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

**Governors**

If an allegation is made against a governor, schools should follow their own local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

**Organisations or individuals using school premises**

Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

**CONCERNS THAT DO NOT MEET THE HARM THRESHOLD/LOW – LEVEL CONCERNS POLICY**

As part of their whole school approach to safeguarding, the school will ensure that they promote an open and transparent culture in which **all** concerns about all adults working in or on behalf of the school (including supply teachers, volunteers (including governors) and contractors) are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - 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

- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

•being over friendly with children;

•having favourites;

•taking photographs of children on their mobile phone;

•engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,

•humiliating children.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

**Sharing/reporting a concern**

Low-level concerns about a member of staff should be reported to the headteacher. Where a low-level concern is raised about the headteacher, it should be shared with the chair of governors. If someone is unclear who they should share their concern with, they should share it with the United Learning Safeguarding Lead, who is part of the Central Office Team. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough

to consider a referral to the LADO or meets the threshold of an allegation. The headteacher should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the headteacher may wish to consult with the DSL and take a more collaborative decision-making approach.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern should be shared with the designated safeguarding lead (or deputy), and/or headteacher, and recorded in accordance with the school's low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the staff member sharing the concern does not wish to be named the school will respect this person's wishes as far as possible.  However, there may be circumstances where the staff member will need to be named (for example where it is necessary in order to carry out a fair disciplinary investigation) and, for this reason, anonymity can never be promised to members of staff who share low-level concerns.

If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

**Self-Reporting**

Occasionally an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an adult may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

**How should a low-level concern be responded to**

The Headteacher should:

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- review the information and determine whether the behaviour (i) is entirely consistent with the school's Code of Conduct and the law, (ii) constitutes a low-level concern, (iii) is serious enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies;
- where the Headteacher is in any doubt whatsoever, they should seek advice from the LADO;
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis.

Advice should be sought from Human Resources and legal services (where necessary) about next steps.

There are a number of potential outcomes e.g.

- If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with the organisation's Code of Conduct and the law it will still be important for the Headteacher to inform the individual in question what was shared about their behaviour, and to give them an opportunity to respond to it; In addition, the Headteacher should speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's Code of Conduct and the law.
- Some will not give rise to any ongoing concern and, accordingly, will not require any further action;
- Others may be most appropriately dealt with by means of management guidance and/or training;
- A low-level concern may require a conversation with the individual about whom the concern has been raised. This should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;
- Some low-level concerns may also raise issues of misconduct or poor performance;
- Some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate;
- A referral to the LADO as the school believes the threshold has been met.
- The school should exercise their professional judgement and, if in any doubt, they should seek advice from other external agencies including the LADO.

The Headteacher should review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews should be made.


**Recording concerns**

All procedures for recording and storing of records should comply with United Learning's Data Protection Policies.

All low-level concerns should be recorded in writing by the Headteacher. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The name of the individual sharing the low-level concern, and their role, should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this should be fairly recorded alongside the concern. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

There should be appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses;
- all external conversations – for example, with the LADO/other external agencies;
- the rationale for decisions;
- any action taken.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Adults about whom a low-level concern has been raised may have rights of access to such records, provided of course that this would not also unreasonably disclose information of children concerned.

The school should retain the record consistent with comply with United Learning's Data Protection policies. The school should retain all records of low-level concerns (including those which are subsequently deemed by the Headteacher to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual these should be kept in chronological order as a running record. These records should be kept confidential and held securely, with access afforded only to a limited number of individuals such as Headteacher and the individual they report to (e.g. Regional Director); and senior HR officer, and the individual they report to (e.g. Head of HR). The Headteacher may store the central low level concerns file with his/her other safeguarding and child protection records.

Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger the disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and, perhaps following consultation, a referral is made to them, then records relating to the low-level concern should be placed and retained on the staff member's personnel file.

If a low-level concern (or group of concerns) is reclassified as an allegation, all previous records of low-level concerns relating to the same individual should be moved from the central low-level concerns file to the staff member's personnel file and retained in accordance with Part 4 of KCSIE.

When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference, for example, misconduct or consistent poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. Where a low-level concern (or group of concerns) has met the threshold for referral to LADO and found to be substantiated, it should be referred to in a reference. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

The school will refer to Part Four, Section Two of KCSIE for further advice and guidance.


## STAFF BEHAVIOUR POLICY / CODE OF CONDUCT

The school's Staff Handbook is circulated to staff annually and upon induction – copies can be requested in the school office. The aim of the Staff Handbook is to provide clear guidance about behaviour and actions and responses to low level concerns in order not to place students or staff at risk of harm or of allegation of harm to a student.

## SAFER RECRUITMENT

The school is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Under no circumstances will an individual commence work <u>unsupervised</u> in sole charge of, or in unaccompanied contact with, children without a cleared DBS check. In this case, the individual will have a separate Barred List check and the school will undertake a written Risk Assessment exercise in relation to the proposed work. All other safeguarding checks will be completed and the individual will be appropriately supervised. Please refer to Section C and Appendix 5 of the 'Safeguarding Children – HR Procedural Guidance' available on the United Learning Hub for further guidance.

Full details of the school's safer recruitment procedures for checking the suitability of staff, members of the School LGB and Trustees of ULT and volunteers to work with children and young people is set out in

- United Learning / the School's Recruitment and Selection Policy;
- United Learning's Safeguarding Children – HR Procedural Guidance;
- United Learning's LGB Handbook; and
- United Learning's guidance: Trustees - Recruitment, Appointment, and Removal Process

These documents are available on the United Learning Hub.

The school's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised is that they are always accompanied by school staff and are never left to work unsupervised with individuals or groups of children. School staff have knowledge of the content of presentations prior to them being delivered to children.

## MANAGEMENT OF SAFEGUARDING

The School's DSL is Casey Groves who is a member of the leadership team.

Jo Gravestock, Clare Jackson, Karen Crutchfield and Martha Williams are the DDSLs and the people to whom reports should be made in the absence of the DSL. This ensures there is always the required cover for the role.

The DSL and DDSLs contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the school. The DSL's responsibility is to maintain an overview of safeguarding within the school (including online safety and understanding the filtering and monitoring systems and processes in place), to open channels of communication with local statutory agencies, to liaise closely with safeguarding partners (such as children's social care and the police), support staff in carrying out their safeguarding duties children's social care and the police), support staff in carrying out their safeguarding duties and to monitor the effectiveness of the school's policies and procedures in practice. The DSL (and DDSL) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

The DSL works with the LGB to review and update the school's safeguarding policy. Where a student leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse, who have a social worker, or who are receiving support through the Channel programme, and have that support in place for when the child arrives. The school will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

The DSL will inform the safeguarding partners of any incident which they think should be considered for a child safeguarding practice review.

The DSL regularly reviews the school's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in their absence, to a member of the senior management team or directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL or DDSLs will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, the school's arrangements are that staff leading the activities contact the DSL either via email or mobile phone.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

**TRAINING**

Induction and training (including online safety, which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) are in line with advice from local safeguarding partners.

**All Staff**

All new staff* will be provided with induction training that includes:

- Safeguarding and child protection, including online safety
- the child protection policy, including information about the identity and role of the DSL and DDSLs
- the behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- the safeguarding response to children who go missing from education
- the Staff Handbook including the school's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- a copy of Part 1 of *KCSIE* (current edition / publication)
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE*.

Induction training usually takes place prior to staff commencing work within the school. Copies of the above documents are provided to all 'staff' during induction.  On appointment and as part of United Learning Annual Declaration, all staff will receive and sign the up-to-date versions of the Staff Student Relationship Letter and Acceptable Use Declaration. The Staff Handbook is shared with staff annually and upon induction. Copies can be requested from the school office.

Temporary staff and volunteers are provided with a safeguarding leaflet as part of their induction. A folder is provided for supply teachers which contains copies of the school's Safeguarding Procedures.

As part of the whole school safeguarding approach, all staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so via a signed form.  Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via face-to-face training or email.
- Understand key information contained in Part One of *KCSIE*. The school will ensure staff understanding by incorporating this into safeguarding training and staff briefings (half termly Safeguarding Bites).
- Receive training in safeguarding and child protection regularly, in line with advice from the local safeguarding partners. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The school provides these via, for example, emails, e-bulletins, staff meetings and Safeguarding Bites.

**DSL(s) - Designated Safeguarding Lead (s)**

The DSL receives updated child protection training at least every two years to provide them with the knowledge, skills and authority required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the local safeguarding partners' approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE.*

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSLs are trained to the same level as the DSL.

*Whilst external catering and maintenance staff are not technically United Learning/school employees (and therefore safeguarding training is not the responsibility of the school), they should receive an appropriate safeguarding induction to ensure they are aware of and understand all the school's relevant safeguarding policies (e.g. safeguarding policy/whistleblowing policy).

**Governors and Trustees**

All governors and trustees must receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in are effective and support the delivery of a robust whole school approach to safeguarding. This training should be regularly updated.

All governors (and proprietors) should be aware of their obligations under the Human Rights Act 1998 and, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

**OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES**

Reena Keeble is the board-level lead designated to take a lead in relation to responsibility for the Trust's safeguarding arrangements. Jo Findlay is the LGB lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the school. They are a member of the School's LGB

A review of the school's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. This is done via the United Learning Safeguarding Checklist and through termly reviews with the Safeguarding Governor. The school draws on the expertise of staff, including the DSL(s), in shaping the school's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the school will work with the Local Authority designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

**THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

**Teaching children how to keep safe**

The local governing body and United Learning Trust ensures that all students are taught about safeguarding, including online, through the curriculum, Relationships Education and Health Education and PSHE to help children to adjust their behaviours to reduce risks and build resilience, including to radicalisation. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. It will also include teaching students, for example, about healthy relationships, consent and that sexual violence and sexual harassment is always wrong.

The school recognises the additional risks that children with SEND face online and works with the Computing Lead to ensure that additional support and measures are in place to support these children.} Online safety is an integral part of the school's Computing curriculum for all pupils and is taught in an age-appropriate way relevant to pupils' lives.  It is essential that children are safeguarded from potentially harmful and inappropriate online material. A whole school approach is taken to online safety in the E-Safety Policy] that empowers the school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

It is also embedded in PSHE and Relationships Education. Pupils will be taught what positive, healthy and respectful online relationships look like; the effects of their online actions on others; how to recognise and display respectful behaviour online; how to use technology safely, responsibly and securely; and where to go for help and support when they have concerns.}

The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online, which must be regularly reviewed for their effectiveness. The school's systems are managed by JSPC and use Exa SurfProtect Quantum filtering system. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Children are monitored carefully when using devices that have access to the internet.  Any mobile phone brought into the school is left in a secured location in the classroom during the day and are collected at the end of the day – only UKS2 are allowed to bring mobile phones into school.

The leadership team and relevant staff must have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively. If staff have any concerns, they should be reported to the DSL/DDSLs/Principal and recorded on CPOMS, as outlined in the school's Filtering and Monitoring Procedure Checklist.

The school will communicate with parents and carers to reinforce the importance of children being safe online and to help them understand what systems schools and colleges use to filter and monitor online use.  It will be especially important for the school to make parents and carers aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Further detail of the school's approach to online safety can be found in the school's E-Safety Policy and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the school's systems.

**Looked after children (and previously looked after children)**

Looked after children (and previously looked after children) are a particularly vulnerable group. The school will ensure that prompt action is taken when necessary to safeguard these children and the local governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

Clare Jackson is the designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs identified in personal education plans are met. The school ensures that the designated member of staff receives appropriate training to carry out their role and has the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual school head.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual school heads to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

**Children potentially at greater risk of harm (Children who need a social worker - Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Where the local authority has made the school aware a child has a social worker, the designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

This information will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

**Use of 'reasonable force'**

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The school recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND, mental health or with medical conditions. The school will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

At Glebe Primary School, the staff work in a supportive and nurturing way with the children to bring about successful resolutions to challenging behaviour. Staff use a range of de-escalation strategies to ensure that, in the majority of cases, situations are diffused without the need for positive handling (restraint).

Positive handling will only be used as a last resort, when other de-escalation strategies have been tried and when:
• A child is placing themselves at risk of harm
• A child is placing others at risk of harm
• There is a risk of significant damage to school property / the environment.

The school's procedures for use of reasonable force can be found in the Behaviour Policy. If it has been necessary to use restraint (to hold back physically or bring a pupil under control), parents will be notified, the incident will be logged on the school's CPOMS system and also in the 'Bound Book'. These records are closely monitored by the DSL and headteacher and if records indicate that there are repeated incidents of a child being restrained, a behaviour risk assessment will be written to ensure that the child and staff involved are receiving adequate support and that there is consistency in approach for all concerned. This will also identify de-escalation strategies and key indicators to ensure that restraint is rarely used and, unless there is immediate risk of significant harm, only when all other strategies have been tried. The risk assessment will also be shared with parents and regularly reviewed.

## Arrangements for Visiting Speakers

The school has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The school's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The school is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the school. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the school may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the school site, will be supervised by a school employee. Any other visitors to the school, for example peripatetic music teachers, receive a safeguarding leaflet outlining how to raise a concern and they are DBS checked if working alone with pupils. Visitors without DBS clearance are given a red lanyard on arrival so staff and pupils know they must remain supervised at all times. Visitors with DBS clearance are given a green lanyard and may work alone with pupils.

## Use of school or college premises for non-school/college activities

Where governing bodies or proprietors hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The governing body or proprietor will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

**EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

**Disqualification from working in childcare**

Where staff work in, or are involved in the management of, the school's early years or provision of care of students under the age of eight, the school will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the school's safer recruitment practices, further details of which can be found in the school's [● Recruitment and Selection Policy].

The school records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the school will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the school will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

**Use of mobile phones and cameras**

The school's policy on the use of mobile phones and cameras in the setting:

· Staff are not permitted to use their personal mobile devices or cameras in school except in the school offices, DSL room, AHT offices, DHT office, HT office and staffroom(if children are not present in the room). Mobile phones are used by key school leaders in office spaces for CPOMS (safeguarding ) online security access.
· Lead teachers on school trips may use their mobile phone to stay in contact with school for any messages.
· Staff may use their phones on non-pupil days and during school holidays on-site and after children have gone home at the end of the school day. This is also true before school time starts in the early morning.
· Staff who wish to use or take photographs or video of students (whether on a personal or school device) may only use their school owned device and school account e.g. Ipad for teaching and learning purposes.

- Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Head.
- Staff who act in breach of this may be subject to disciplinary action.
- Parents are not permitted to use their mobile phones or camera inside the school building without prior approval from the Head.
- Children in Y5 and Y6 only are permitted to walk home and arrive without a parent/carer (with written permission). These children may bring their mobile phone to school. They must put it in their bag when they come through the gate in the morning and leave it in their bag until they hand their phone over to teachers at registration time. Phones are then locked away by the teacher for the day. Phones are returned at the end of the school day and children then put them in their bags until they leave the school gate. If a child with a phone has an after school club then the after school leader looks after their phone until it is home time.

All EYFS staff are also referred to United Learning E-Safety Policy (available on the United Learning Hub).

**DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Casey Groves.

**Duty to notify/report to Ofsted a serious childcare incident**

The school will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the school is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the school became aware (or ought reasonably to have become aware) of it.

The school will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

The school will notify Ofsted of any serious accident, illness or injury to, or death of, any child while in their care, and of the action taken. Notification must be made as soon as is reasonably practicable, but in any event within 14 days of the incident occurring. A registered provider, who, without reasonable excuse, fails to comply with this requirement, commits an offence. Providers must notify local child protection agencies of any serious accident or injury to, or the death of, any child while in their care, and must act on any advice from those agencies.

**Waiver from Disqualification**

In certain circumstances, a person who is disqualified from registration by Ofsted may apply to Ofsted for a waiver of disqualification unless, for example, they are barred from working with children.

**Police attendance on school site (Statutory Guidance – PACE Code C 2019)**

Students may only be interviewed at their place of education in exceptional circumstances and only when the headteacher or their nominee agrees. Every effort will be made to notify the parent(s) or other person responsible for the student's welfare and the appropriate adult, if this is a different person, that the police want to interview the student and reasonable time will be allowed to enable the appropriate adult to be present at the interview. If awaiting the appropriate adult would cause unreasonable delay, and unless the student is suspected of an offence against the educational establishment, the headteacher or their nominee will act as the appropriate adult for the purposes of the interview.

# APPENDIX 1 –FURTHER INFORMATION

All staff should be aware of indicators of abuse and neglect, as well as specific safeguarding issues such as child criminal exploitation and child sexual exploitation. Staff should always be vigilant, and if unsure, should **always** speak to the DSL or DDSL.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from other children within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

All staff should be aware that behaviours linked to drug taking and/or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Staff are referred to DfE guidance Sexual Violence and Sexual Harassment for further information.

**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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually

inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children (also known as child-on-child abuse) is a specific safeguarding issue in education and **all** staff should be aware of it and of their school's policy and procedures for dealing with it.

**Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic abuse; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

**Child Criminal Exploitation (CCE) and Child Sexual Exploitations** are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

More information can be found at:

Multi-agency practice principles for responding to child exploitation and extra-familial harm

Non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

**Child Criminal Exploitation (CCE)** Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

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

**Child Sexual Exploitation (CSE):** CSE is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact: it can also occur through the use of technology.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; can still be abuse even if the sexual activity appears consensual; can include both contact (penetrative e.g. rape and oral sex and non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing) and non-contact sexual activity (such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. It can take place in person or via technology, or a combination of both; can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence; may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media); can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of sexual exploitation:

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

CSE is a geographically widespread form of harm that is a typical **feature of county lines** criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and

money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of drugs trafficking. The DSL or DDSL will consider a referral to the National Referral Mechanism as soon as possible if there are county line concerns, such as a child being a potential victim of modern slavery or human trafficking.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with **serious violent crime**. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

If staff have a concern about a child or a child makes a report to a member of staff, staff should follow the referral process in this policy. If staff are in any doubt about what to do, they should speak to the DSL or DDSL.

**County lines**

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

The Home Office have provided further information in the document below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf

**So called 'Honour Based' Abuse:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing. It can include multiple perpetrators.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the multi-agency statutory guidance on FGM.

If staff have a concern that a student may be at risk of HBA or has suffered HBA, they should speak to the DSL (or DDSL). As appropriate they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence), teachers should follow the school's local safeguarding procedures.

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at: **https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage** . School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

**Preventing Radicalisation:** Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' safeguarding approach.

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

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

• **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.


**Special Educational Needs and/or Disabilities or physical health issues**: Students with SEND or certain health conditions can face additional safeguarding challenges.  They may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. Students with SEND are more likely to be abused by other children. The barriers to recognising abuse and neglect of this group of children can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or health condition without further exploration;
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, including prejudice-based bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

To address these additional challenges, the school has put in place the following pastoral support measures: support will be offered through the Pastoral Lead, Thrive team and SENDCO, who all work with children with SEND in the school on a regular basis. Any concerns will be reported to the DSL or DDSLs and recorded on CPOMS. Appropriate action will be taken, based on the information received, following safeguarding protocols and procedures.

Further guidance can be found in the DfE guidance Supporting pupils at school with medical conditions, and where applicable in the SEND Code of Practice.

Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSL and named person with oversight for SEN.

**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. The school provides a safe space for children to speak out or share their concerns with members of staff whom they trust and are familiar with. The school also provides locked worry boxes in the corridor which are checked regularly by the Thrive team. In addition, specific PSHE curriculum content is designed to support this area.

**Children and the court system:** Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and this will be stressful for them. Making child arrangements following separation can also be stressful and entrench conflict in families. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy.

**Children who go missing from education/children absent from education or school:** A child going missing is a potential indicator of a range of safeguarding possibilities, such as abuse or neglect. The school holds more than one emergency contact number for each student so additional options are available to contact a responsible adult when a child who is identified as missing is also identified as a welfare and/or safety concern.

Staff must follow the school's procedures for dealing with children who go missing, particularly on repeat occasions. The school's procedure for dealing with children who go missing can be found the school's Attendance Policy. All unexplained or unauthorised absences will be followed up in accordance with this Attendance Policy.

The school shall inform the local authority of any student who is going to be added to or deleted from the school's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and

b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The school will inform the local authority (and the local authority where the child is normally resident) of any student who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority. These intervals are as outlined above.

Action should be taken in accordance with this policy if any absence of a student from the school gives rise to a concern about their welfare.

**Children with family members in prison:** Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy.

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

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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at:
www.actionagainstabduction.org
and www.clevernevergoes.org.

Children in need: defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child with a disability. Local authorities are required to provide services to safeguard or promote the welfare of children in need, and they may be assessed under s17 Children Act 1989.

**Domestic abuse:** Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

**Homelessness:** Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. The DSL or DDSL will raise/progress any concerns about homelessness with the Local Housing Authority although this does not replace a referral into children's social care where a child has been harmed or is at risk of harm.

**Child-on-child abuse**

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to):
- abuse within intimate partner relationships between children/peers;

- bullying (including cyberbullying) prejudice-based and discriminatory bullying;
- 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;
- 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);
- consensual and non-consensual sharing nudes and semi-nudes images and videos (also known as sexting or youth produced sexual imagery);
- upskirting (see below);
- initiation/hazing type violence and rituals (this could include abuse or humiliation used as a way of initiating a person into a group or event including online).

It can happen both inside and outside school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse, how to identify it and respond to reports. **Even if there are no reports in the school, this does not mean that it is not happening. Any concerns regarding child-on-child abuse must be referred to the DSL or DDSL.**

**Sexual violence and sexual harassment between children in schools and colleges**

**Context**

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and 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;

- • not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- • 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.

**What is sexual violence and sexual harassment?**

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

**Rape**: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

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

**Sexual Assault**: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents.  This could be forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. **What is consent**? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

a child under the age of 13 can never consent to any sexual activity;

• the age of consent is 16;

• sexual intercourse without consent is rape.

**Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:
• sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;

• sexual "jokes" or taunting;

• physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

• online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

     o non-consensual sharing of nudes and semi-nudes images and videos;

     o sexualised online bullying;

     o unwanted sexual comments and messages, including, on social media;

     o sexual exploitation; coercion and threats; and

     o upskirting.

**Upskirting**

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

**The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is important. It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy).

**Mental Health:** All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

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

Reference should be made to:

Mental Health and Behaviour in schools DfE guidance (November 2018);

DfE guidance 'promoting and supporting mental health and wellbeing in schools, which details numerous resources available to schools; and

Public Health England: Promoting children and young people's emotional health and wellbeing a whole school and college approach

Paragraphs 183-185 of 'Keeping Children Safe in Education'

If there are concerns regarding mental health of children, a member of the Thrive team should be contacted and information added to CPOMS (so that the DSL and DDSLs are all aware). The Thrive team will be available to offer support. If needed, the Pastoral Lead will identify if an onward referral is appropriate and advise the most suitable route available, consulting with SPOA (Single Point of Access) if needed. Referrals can be made to the MHST (Mental Health Support Team) along with other organisations, if appropriate, for example, Young Minds, YES (for those 11 years old and over), CMHL (Community Mental Health Liaison) and CAMHS. Cases will be escalated to IFD if appropriate or in the case of an emergency, 999 called.

If there are concerns regarding the mental health of parents, these will be logged on CPOMS and the DSL can advise if further action is recommended.

If there are concerns regarding the mental health of staff, line manager support structure is in place in the first instance. If further support is needed, Karen Crutchfield is the Senior Mental Health Lead in the school and there are two Wellbeing Governors (Jo Findlay and Celina Tickner). United Learning offer free support with Confidential Care. Support will be offered to the member of staff alongside regular meetings to provide opportunity to discuss any adjustments that need to be made. In the case of an emergency, 999 will be called.

**Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

**Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

**A Whole School Culture of Safeguarding**

Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures.

**APPENDIX 2 – Meet the Safeguarding Team (Template)**

**The Designated Safeguarding Lead is:**

Mrs Casey Groves



Casey is located at:
Pastoral Lead Office

**The Deputy Designated Safeguarding Leads are:**

Mrs Jo Gravestock



Jo  is located at:
Thrive room

Miss Clare Jackson



Clare is located at:
SENDCO office

Mrs Karen Crutchfield



Karen is located at:
Headteacher office

Miss Martha Williams



Martha is located at:
KS1 Team Leader office

**APPENDIX 3 – Safeguarding Training Log (Template)**

| Safeguarding Training Log – Academic Year 2023-2024 | | |
|---|---|---|
| **Attendees** | **Type of training provided** | **Date undertaken** |
| Head | DSL Refresher Training<br>Safer Recruitment Training<br>WSCC Prevent Duty Training | July 2022<br>December 2021<br>January 2023 |
| DSL | DSL Refresher Training<br>WSCC Prevent Duty Training<br>Self Harm<br>Online Safety: Keeping Children Safe Online<br>Team Teach: Positive Behaviour Training | June 2023<br>January 2023<br>March 2022<br>Feb 2022<br><br>Feb 2023 |
| DDSL (JG, CJ, MW) | DSL Training (JG)<br>DSL Training (CJ)<br>DSL Training (MW)<br>Safer Recruitment Training (CJ)<br>Safer Recruitment Training (MW)<br>WSCC Prevent Duty Training (JG, CJ)<br>Team Teach: Positive Behaviour Training (JG and CJ)<br>Certificate in understanding Domestic Abuse and Violence<br>Citizenship training: Right Here, Right Now | Jan 2023<br>July 2022<br>June 2022<br>April 2023<br>Dec 2021<br>Jan 2023<br>Feb 2023<br><br>May 2022<br><br>May 2022 |
| Senior Leadership Team (CL, HL, JP, MR, RD, AF) | Annual Safeguarding Training (all)<br>DSL Refresher (CL)<br>DSL Training (MR and JP)<br>Safer Recruitment training (CL, MR, RD)<br>Safer Recruitment training (AF)<br>WSCC Prevent Duty Training (CL)<br>Online Safety: Keeping Children Safe Online (CL)<br>Sexual Harassment and Sexual Behaviours (CL)<br>Child Criminal and Sex Exploitation<br>Team Teach: Positive Behaviour Training (CL) | Sept 2023<br>June 2023<br>To be undertaken Jan 2024<br>Dec 2021<br><br>Sept 2022<br>Jan 2023<br>Feb 2022<br><br>May 2022<br><br>June 2022<br>Feb 2023 |
| Pastoral Leads | See DSL above | |
| Whole School | Annual Safeguarding Training<br>Safeguarding Bites | Sept 2023<br>Half termly |
| e-safety Lead | Annual Safeguarding Training | Sept 2023 |
| Medical Needs Officer | Annual Safeguarding Training | Sept 2023 |
| Paediatric First Aiders | Annual Safeguarding Training | Sept 2023 |

| | | |
|---|---|---|
| Health & Safety /COSH | Annual Safeguarding Training | Sept 2023 |
| EVC | Annual Safeguarding Training | Sept 2023 |
| Chair of Governors of LGB (JD) | Annual Governor Safeguarding training | Sept 2023 |
| | Understanding changes to the DFE KCSIE Statutory Safeguarding Guidance | Jan 2023 |
| | Cyber Security for Schools | April 2022 |
| | Safeguarding and Prevent Duty | Jan 2023 |
| | Safeguarding in the Early Years | April 2022 |
| Nominated Safeguarding Governor of LGB (JF) | Annual Governor Safeguarding training | Sept 2023 |
| | Responsibilities of the GB in relation to Safeguarding (WSCC) | Sept 2022 |
| | Safer Recruitment in Education | Sept 2022 |
| | WSCC Lead Governor Training for Safeguarding | March 2023 |
| | Prevent Duty | March 2022 |
| Local Governing Body (whole board) | Annual Governor Safeguarding training (all) | Sept 2023 |
| | Understanding the SCR (JS) | April 2022 |
| | Safeguarding for School Governors (JS & IJ) | Feb 2022 |
| | Annual Certificate in Safeguarding for Governors (National College) (CT) | Jan 2023 |
| | Prevent Duty (CT) | Nov 2022 |
| | Prevent Duty (FD) | April 2022 |
| | Prevent Duty (CK) | Dec 2021 |
| Agency Staff /Peripatetic | See individual records | Various |
| Volunteers | On induction (see individual induction checklists) | Various |
| Contractors | School safeguarding leaflet provided for contractors on site when children are present. | Various |
| Other | | |

**APPENDIX 4 – STAFF/STUDENT RELATIONSHIP LETTER AND GUIDANCE NOTES**

*Glebe Primary School*

*United Learning*

Dear Colleague,                                                                                    September 2023

Every one of us working within United Learning, whatever our role, is acutely aware that the protection of children is of the highest possible importance. Trust underpins everything that we do in schools. The parents of our pupils entrust the care of their children to us and together we are all responsible for their wellbeing. United Learning also has a responsibility to ensure that those working in our schools are themselves protected - against putting themselves in a vulnerable position and against the possibility of false accusation.

This letter has also been prompted by the isolated actions of a small number of employees who have acted improperly or who have found/put themselves in a vulnerable position. The focus on appropriate use of social media remains a priority for us. Instances where inappropriate usage has been identified has led to disciplinary action including in the most serious cases dismissal for gross misconduct. I am writing to every person employed by United Learning to remind us all just how serious these matters are, but also to offer some advice as to how to respond in potentially difficult situations.

Headteachers will discuss this issue with their staff at appropriate times during the school year. This letter reinforces those statements and ensures that no-one associated with our schools is in any doubt that child protection is an issue that must be treated with the utmost seriousness. Acts of child abuse may be blatant and incontrovertible. However, they may also be more subtle. It is important that low level concerns are properly identified, reported and addressed. This supports a strong safeguarding culture which protects pupils and staff.

It must be understood that the following are almost always inappropriate within the professional context of schools and can easily be construed as child abuse in some circumstances:

- touching and physical contact, other than for staff working with very young children in primary or nursery settings, where it is expected that they will have necessary physical contact and display affection to properly fulfil their role to nurture, support and care for those children;

- contact through electronic or digital communications using personal accounts.

Against this background, we must ensure that no situation could arise which is or could reasonably be construed as acting against the safety of each child. This is not always an easy line to draw but crossing that line, or being in a position where it appears that the line has been crossed, is unacceptable. Some adults within the school undertake roles where this is even more important because of the ease with which the proper execution of their duties might be misinterpreted or because the vulnerability of the young people in their care might be more easily exploited. These might include those:

- working in boarding houses or residential situations, including, for example, school trips and excursions;
- whose work requires them to interact in a one to one situation, particularly when that work takes place behind closed doors as is often the case with peripatetic music lessons;
- whose work by its nature requires some physical contact with children, for example, those working with very young children and those involved in the coaching of sport or other practical subjects where a correct technique may need to be demonstrated;
- who have high levels of access to ICT systems and, indeed, all who use the internet, email, text messaging and other forms of electronic communication;
- young employees and workers whose duties require them to work with older pupils (e.g. sixth formers) where the age differential is quite small;
- who work with especially vulnerable children for example those with special educational needs, disabilities, mental illness or those that require intimate care.

Within each school, Headteachers will issue both verbal and written guidance from time to time and will make available appropriate training to help everyone deal with this difficult issue.  A statement of guidance follows this letter.  The DfE has published updated guidance for all schools on their duties to safeguard and promote the wellbeing of children, Keeping children safe in education - GOV.UK (www.gov.uk). It is important that you are familiar with this guidance and, as a statutory minimum, have read and can demonstrate your understanding of your responsibilities in relation to Keeping Children Safe in Education Part 1 and Part B.

Finally, having said all this, it is still important for all of us to retain an appropriate balance.  United Learning greatly appreciates the devotion and commitment of all of you who work in our schools.  We know that your work is effective because every day you respect and care for children, enjoy their company and celebrate their achievements.  The trust placed in us as we guide young people through their formative years is huge; we all need to help each other shoulder this responsibility to the very best of our ability. Thank you again for all you have done and continue to do for children and young people in our schools.

Yours sincerely

Sir Jon Coles                                              Karen Crutchfield
Chief Executive                                          Headteacher
United Learning                                          Glebe Primary School

# UNITED LEARNING NOTES OF GUIDANCE FOR STAFF-STUDENT RELATIONSHIPS 2023

This guidance is not exhaustive and is designed to set out principles rather than to give detailed and specific advice. Clearly, the circumstances in which staff work vary (e.g. working with very young children, boarding staff, sports staff, etc.); this guidance is meant to give general principles only. Indeed, for staff working with very young children in primary or nursery settings it is expected that they will have necessary physical contact and display affection to properly fulfil their role to nurture, support and care for those children. Although this advice applies primarily to teachers and to other adults with educational roles, all adults working within schools relate to students during the course of their duties; again, the general principles apply equally to all who are involved in the school. Staff should be aware that departure from this guidance could result in disciplinary action.

1    The relationship between staff and students is a professional one. It is fully expected – and, indeed, hoped – that staff in the school have a friendly and caring relationship with students; nevertheless, the basis of that relationship is professional, not personal. It is suggested that a good test to apply is to reflect on whether the child's parents or the Headteacher would be happy with the relationship if they were standing with you.

2    A personal relationship between staff and a student is inappropriate unless it is with the full knowledge and consent of the student's parents or guardians and the Headteacher. Circumstances in which such a personal relationship may arise might be when your own children are friends with those in the school or when you have a personal relationship with parents of children in the school. It is not normally appropriate for students to visit a member of staff in their own home or for a member of staff to meet with a student out of school hours or off school premises except with the prior knowledge and consent of parents and the school.

3    In general, unnecessary physical contact with students must be avoided. In some circumstances, physical contact between a member of staff and a student is necessary and beneficial; it might be, for example, that a Reception teacher might need to pick up a 5 year old who has fallen over in the playground, a sports coach may need to demonstrate to a student how to hold a racket or a secondary teacher may give a student a gentle pat on the back as encouragement. In rare circumstances it may be appropriate for members of staff to use reasonable physical intervention/restraint in circumstances where a student is behaving in a manner which endangers themself or other people. In these situations, staff are advised to be very sensitive to the student's likely reaction and to watch out for signs that the student is apprehensive or uncomfortable. We all have our own personal space that needs to be protected.

4    Over-familiar words and actions, displays of affection, discussion of one's personal life or the personal life of the student are almost always inappropriate. Sexual innuendo is wrong in all circumstances. Staff must avoid actions, words or expressions that could be interpreted as suggesting that they have an emotional relationship with any student. In the professional staff-student relationship it is not appropriate to single a student out for favours or gifts, or to suggest to a student that they are a special friend.

5    Occasionally it is necessary for professional academic reasons for staff to communicate with students out of school.  Except where absolutely necessary, personal email addresses, home or mobile phone numbers, social media contact details, online aliases or text based messaging aliases must not be given, asked for or used.  A staff mobile phone number might be given to students for use during an educational visit; where possible, the school's mobile phone (if there is one) should be used for this purpose. Pastoral matters should not normally be dealt with by personal email or using personal phone contacts. Only in the most exceptional circumstances, for instance, where there is well-founded concern for the unexplained whereabouts of a student, should pastoral matters be dealt with by personal email, using personal phone contact or other personal communication tools.  In any event, records of all contacts must be kept on the student file so that if it is necessary to use email or personal contact, the reason why will be specified in the written record. It is very difficult to envisage circumstances under which individual contact is appropriate except through official school channels. If staff need to contact a student or parent and do not have access to a work phone they should follow the Safer Working Practice guidance.

6    It is not appropriate for boarders to have access to staff residential accommodation, other than in exceptional circumstances. Where this does occur, it must be with the full knowledge and consent of the School. One-to-one situations must be avoided, with another adult(s) always present.

7    With older students, where a gathering is held as part of a celebration, it is generally advisable that this is held on school premises. It is essential that professional criteria (e.g. all the students in a particular teaching or tutorial group) rather than personal criteria (e.g. selected students only) are used for inviting students, that the event is held openly, and that senior colleagues are aware of it.  Staff on such an occasion have a particular duty to ensure that the supply and consumption of alcohol is appropriate, is responsible and falls within the law and the school's guidelines on alcohol. As a rule, staff should not consume alcohol whilst in the company of children. This includes educational visits and celebratory functions. There will be occasional situations where alcohol is served either at a meal or school function and in these instances should be approved by the Headteacher in advance.

8    Wherever possible when working with students, other people (adults, colleagues or students) should be present or the door should be open. All members of staff who, in the course of their professional duties, need to work on a one-to-one basis with a student (e.g. a piano lesson, a maths tutorial, etc.), must take care to ensure that the circumstances of the meeting or lesson are always entirely professional.  Staff are advised to use a room which has vision panels in the door or keep the door open and ensure that colleagues know that the meeting or lesson is taking place.  It is helpful if the meeting or lesson can be arranged during normal school hours or immediately before or after school when there are plenty of other people about. Similarly, where it is necessary for staff to drive students in their own cars, e.g. to sporting fixtures, drivers should ensure they are not alone with just one student, written parental consent should be obtained and a central dropping off point arranged rather than home drops.

9    Staff must avoid threatening words, raised voices and any aggressive contact such as holding, pushing, pulling or hitting, which could amount to or which could be interpreted as criminal assault.

10   There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers a broad range of actions that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent injury or violence. 'Reasonable' in these circumstances means 'using no more force than is needed'. This may involve either passive physical contact, such as standing between pupils, or active physical contact such as leading the pupil by the arm. Current DfE guidance is contained in 'Using Reasonable Force: Advice for head teachers, staff and governing bodies' which can be found on United Hub. Members of staff must also ensure they are familiar with the Independent School's/Academy's physical restraint policy and procedures document (or behaviour policy if this is where procedures regarding physical intervention/restraint are).

11   Social networking sites used for personal use, such as Facebook, Twitter, Instagram, WhatsApp, TikTok, online games, digital communication/online services and other digital media, pose risks for all staff in terms of professional integrity and the welfare of students.

     (a)   Staff must not use these sites to contact or communicate with current students, students who have recently left, or ex-students under the age of 18 or who are still in full time education. Employees wishing to befriend students who are over 18 and who have left school should do so with extreme caution and with the knowledge that any content posted on either ex-students' or their own social network, may not only compromise their own position but that of any colleagues with whom they are also friends and who may not want their content to be seen by any ex-student. Unfortunately, some students post information on their social networking sites which is inappropriate in language or visuals. To view such pages may alter your judgement of students, to be known to be viewing them may alter a student's view of you, and to comment to students about what you have seen is likely to have an impact on your professional reputation, as well as possibly causing distress to students concerned.

     (b)   Social media should not be used to address concerns regarding a student's welfare, which should instead be raised with an appropriate member of the school's SLT or safeguarding team.

     (c)   Caution should also be taken when posting or commenting on posts within social media when staff become friends with parents of children at the school, or staff with children at the school, to ensure that they do not put themselves at risk of any accusations or bring their school into disrepute.

     (d)   Should you become aware of material about yourself, the school, a student, a colleague or the Group, which is inappropriate, the Senior Leadership Team must be informed and they will instruct a member of staff to check the allegations and inform the appropriate authorities. You must not check it out yourself.

12    Social networking sites used for professional use, such as LinkedIn, Twitter, YouTube, and other social media, also pose risks for all staff in terms of professional integrity and the welfare of students.

(a)    Before using social media for professional purposes, or as part of their teaching, staff should seek guidance and training on the risks associated with using social media.

(b)    Staff should not follow students' personal social media feeds even though it is likely that students will be following them. It may be appropriate to follow students if done as part of an educational activity but this should be properly risk assessed and not using students' personal accounts.

(c)    Staff are advised not to accept connection requests on sites such as LinkedIn from students. Accepting requests from ex-pupils post 16 or 18 should be used with care and thought given to how much information is visible to connections – phone numbers, email addresses etc.

(d)    When uploading images or posting content on social media platforms, you should not link to children's online personas through tagging or mentions as this will increase the risk to them from online threats. You should also ensure you comply with the school image use policy; such as not including names with pictures and ensuring parental permission has been given before posting a child's image.

(e)    All content posted will be linked to you and your employer. Should you become aware of material about yourself, the school, a student, a colleague or the Group, which is inappropriate, the Senior Leadership Team must be informed and they will instruct a member of staff to check the allegations and inform the appropriate authorities. You must not check it out yourself.

13    If you are at all concerned about anything which has occurred or which has made you uncomfortable, you must discuss the matter with a senior colleague at the earliest opportunity, even if it turns out that nothing untoward has happened.  You must make a written record, dated and signed, of any such incident. Guidance relating to low level concerns in your school's safeguarding policy should be followed.

14    Where any allegation of abuse is made against a teacher, other member of staff or volunteer, the Group is committed to dealing with the allegation fairly, quickly and consistently, in a way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

15    Staff will also find information relevant to staff-student relationships in the policies and procedures in their school or academy which they should make themselves familiar with and cover the following:

(a)    Safeguarding Policy and Child Protection Policy and Procedures;

(b)    Behaviour and Discipline;

(c)    Physical Restraint;

(d)    Email and Internet Acceptable Use Policy;

(e)    Social Media Policy.