Child Protection & Safeguarding Policy

Review Date	October 2023	**Next Review by Date**	September 2024
Reviewed By	Headteacher		
Approved by Governing Body	**December 2023**		

Pathways Education is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. All staff are encouraged to play a part to establish a culture of safeguarding where we listen to and engage in dialogue with children, seeking their views in ways that are appropriate to their age, culture and understanding.

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

Contents

Important Contacts

Designated Safeguarding Lead Headteacher	Nazya Ghalib dsl@pathways-ed.org Tel: 01428 777673
Deputy Designated Safeguarding Lead Deputy Headteacher LAC Lead	Michael Vincent Michael.vincent@pathways-ed.org Tel: 01428 777702
Deputy Designated Safeguarding Lead HLTA	Holly Page Holly.page@pathways-ed.org
Safeguarding Link Governor	Nanci Doyle Nanci.doyle@pathways-ed.org
Chair of Governors	Larry Sullivan Larry.sullivan@pathways-ed.org
Surrey C-SPA	9am to 5pm on Monday to Friday. - Phone: 0300 470 9100 (option 3 for CP consultation line) - Email: cspa@surreycc.gov.uk For people with hearing or speech impairments: - Text line: 07527 182861 - Sign Language Video Relay Service During evenings, weekends and bank holidays, the Emergency Duty Team is available: - Phone: 01483 517898

	• Email: edt.ssd@surreycc.gov.uk For people with hearing or speech impairments: • Text line: 07800 000388 • Text relay (a speech-to-text translation service): 18001 01483 517898
Surrey LADO	Monday to Friday from 9am to 5pm (Duty LADO) • Phone: 0300 123 1650* • Email: lado@surreycc.gov.uk
Hampshire MASH	Office hours 8.30am to 5pm Monday to Thursday, 8.30am to 4.30pm on Friday • Phone: 0300 555 1384 Professionals should complete the Inter Agency Referral Form (IARF). Out of Hours service runs from: 5.00pm to 8.30am on weekdays, 4.30pm on Friday to 8.30am on Monday, 24-hour cover on Bank Holidays • Phone: 0300 555 1373 (public and professionals) • Text: 07565 205102 (hard of hearing/deaf clients only) • Email: out.of.hours@hants.gov.uk (professionals only).
Hampshire LADO	LADO notification form • Phone: 01962 876364 • Email: child.protection@hants.gov.uk
West Sussex MASH	The Integrated Front Door (IFD) is the only public contact point for Early Help and Children's Social Care. • Phone: 01403 229900 • Email: WSChildrenServices@westsussex.gov.uk If you are a professional worker with information or concerns about a child, you should inform the Integrated Front Door (IFD) during office hours on the numbers below. • Phone: 01403 229900 • Email: WSChildrenservices@westsussex.gov.uk from a secure email address

West Sussex LADO	LADOs are Miriam Williams and Donna Tomlinson. • Phone: 0330 222 6450 (Available for Consultation 09.00 – 17.00) • Phone: 01403 229900 (LADO Service) • Email: LADO@WestSussex.gov.uk
Emergency Services	If you think a child is in immediate danger, call the police on 999.
Prevent	Report concerns that a pupil may be at risk of radicalisation or involvement in terrorism: Follow the Prevent referral process and use the Prevent referral form to refer cases by email to preventreferrals@surrey.pnn.police.uk In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264)
Inter-Agency Escalation	For the resolution of professional disagreements and instigation of responses to exceptional issues in work relating to the safety of children: https://surreyscb.procedures.org.uk/skyqox/complaints-and-disagreements/inter-agency-escalation-policy-and-procedure

1 Aims

The school aims to ensure that:

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

This Policy applies to anyone working on behalf of Pathways Education including leaders, the board of trustees, paid staff, volunteers, sessional workers, contracted workers, agency staff and students. Its purpose is to protect and enhance the safety and well-being of all young people by actively promoting awareness, good practise and sound procedures.

'Young Person' means those under 18 years old including all of those up to their 18th birthday- as designated a 'child' within the terms of the Children's Act 1989.

2 Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education (2023)](#) and [Working Together to Safeguard Children (2018)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

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

support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, bi-phobic or transphobic bullying; or racial discrimination.

It is important that everyone at Pathways Education understands their responsibilities under Working Together to Safeguard Children (2018) and the latest Keeping Children Safe in Education (KCSIE) document in order to safeguard children and prevent them from coming to harm. Every member of staff must read part 1 of KCSIE and annex A and the latest Guidance for Safer Working Practice.

3 Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18. On the whole, this will apply to pupils of our school; however, the policy will extend to visiting children and pupils from other establishments.

Staff refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

CPOMS is the acronym for Child Protection and Online Monitoring System, the programme used to store and record all safeguarding concerns.

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

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

Early Help means providing support as soon as any needs emerge or are identified at any point in a child's life.

Social Care refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

MAP refers to the Surrey Multi-Agency Partnership.

C-SPA refers to the Children's Single Point of Access

MASH refers to the Multi-Agency Safeguarding Hub that provides triage and multi-agency assessment of safeguarding concerns - in respect of vulnerable children and adults. It brings together professionals from a range of agencies into an integrated multi-agency team.

The **LADO** (Local Authority Designated Officer) has overall responsibility for the management of allegations of abuse by adults who work with or volunteer with children.

4 Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. These are protected characteristics under the Equality Act 2010 and the Human Rights Act 1998. We give special consideration to children who:

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

5 Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school. Our policy and procedures also apply to extended school and off-site activities. The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, transphobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour and Relationships policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

    o Healthy and respectful relationships

    o Boundaries and consent

    o Stereotyping, prejudice and equality

    o Body confidence and self-esteem

o How to recognise an abusive relationship (including coercive and controlling behaviour)

o The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support

o What constitutes sexual harassment and sexual violence and why they're always unacceptable

All Staff

All staff will:

- Read and understand part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT+ to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the Staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the Behaviour & Relationships policy, and the safeguarding response to children who go Missing from Education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.

- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.
- What to look for to identify children who need help or protection

The Designated Safeguarding Lead (DSL)

At Pathways Education, there is clear leadership of our culture of Safeguarding (see important contacts above).

The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

They can be contacted via e-mail or telephone outside of school hours (see contact details above). All safeguarding concerns that are logged via CPOMS will also send a notification to the DSL via e-mail.

When the DSL is absent, the Deputy Headteacher, will act as cover. If the DSL and deputy are not available, the HLTA, will act as immediate point of reference in their capacity of DDSL, and will liaise with the Safeguarding Link Governor for further next steps where needed (for example, during times of sickness or emergency).

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.

The DSL will also:

- Keep the DSL team informed of any issues.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The Governing Body

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and local multi-agency safeguarding arrangements.
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- Make sure:

    o The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support

    o Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

    o The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns

    o The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure.

    o That this policy reflects children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

    o Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed

    o Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

    o Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors must read Part 1 and Part 2 of KCSIE guidance. The Chair must also read Part 4 and the Safeguarding Link Governor must also read Part 5 to ensure that they have an understanding on the role and requirements of the DSL. However, for best practice, it is recommended that all governors read Keeping Children Safe in Education in its entirety.

The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Ensure that all staff understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DDSL have appropriate time, funding, training and resources, and that there is always adequate cover when needed.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DDSL on this.
- Ensuring the relevant staffing ratios are met, where applicable

6 Safeguarding Knowledge

To support our culture of safeguarding, it is vital that staff understand that safeguarding action may be needed to protect our children from (and not limited to) the abuse in the list below. Regular training is provided so that staff know what to look for to help prevent or report the abuse that children may be suffering. They must make sure they are familiar with the signs that a child may be experiencing abuse. The hyperlinks can be used for more information:

- Neglect
- Physical Abuse
- Sexual Abuse
- Emotional Abuse
- Bullying, including online bullying and prejudice-based bullying

- Racist, disability and homophobic or transphobic abuse (Hate Crimes)
- Gender-based violence
- Child-on-Child abuse such as sexual violence and harassment
- Radicalisation and/extremist behaviour
- Child sexual exploitation and trafficking
- Child criminal exploitation including county lines.
- Serious violent crime
- Online abuse: Risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalisation and risks of accessing and generating inappropriate content, for example 'sexting'.
- Grooming
- Teenage relationship abuse
- Upskirting
- Sexting (or sharing of nudes/semi-nudes)
- Substance misuse
- Contextual safeguarding - Issues that may be specific to a local area or population.
- Domestic Abuse – in order to support children and families experiencing this (Pathways Education have signed up to Operation Encompass)
- Female Genital Mutilation
- Forced Marriage
- Parenting concerns
- Homelessness
- So-called honour-based violence
- Mental Health

7 Recognising Abuse and Taking Action

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

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

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

Speak to the DSL straightaway who will make a referral to children's social care and/or the police immediately. **Anyone can make a referral**. Staff must tell the DSL as soon as possible if they make a referral directly.

The Local Authority that is reported to will be based on where that child lives within their primary residence. Whilst safeguarding referral procedures do differ slightly from borough to borough, they are mostly quite similar.

- To discuss concerns or make a referral contact the MAP/MASH using the Golden Number that can be found on any of the Safeguarding posters in school.
- A referral form will need to be completed following any phone call concerns that require further information. This form is available on the MAP/MASH webpage and can also be completed without making telephone contact.
- The MAP/MASH will review the information on the referral form and where necessary contact the referrer to ascertain further information. The MAP/MASH will confirm receipt of the referral and then provide feedback on the decision about the referral. It is important that as much information as possible is provided in the first instance on the form and that a copy is stored securely for future reference by the referrer and their organization.
- If the child is in immediate danger call the Police, 999. Complete and send the C-SPA/MASH referral form after the child's immediate safety has been addressed.

If a child makes a disclosure

If a child discloses a safeguarding issue, staff should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Log the write-up using CPOMS and submit it to the DSL; where possible, notify the DSL in person that a disclosure has been made.
- For anyone who does not have access to CPOMS , If you do not have a login for CPOMS then paper referrals are to be used instead (yellow Welfare Concern Form found in the office – Appendix 2) to record the information and pass directly onto the DSL.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise their experiences as harmful

- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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

Where possible, speak to the DSL to agree a course of action. Pathways Education actively encourages all concerns, no matter how insignificant they may seem, to be logged via CPOMS to ensure a broad profile can be built around all vulnerable children. Wherever paper copies of concerns are logged, the DSL will record these on CPOMS also.

If in exceptional circumstances the DSL or DDSL is not available, this should not delay appropriate action being taken. Speak to a senior member of staff or take advice from local authority children's social care (See 'Referral' below). You can also seek advice at any time from the NSPCC helpline. Share details of any actions you take with the DSL as soon as practically possible.
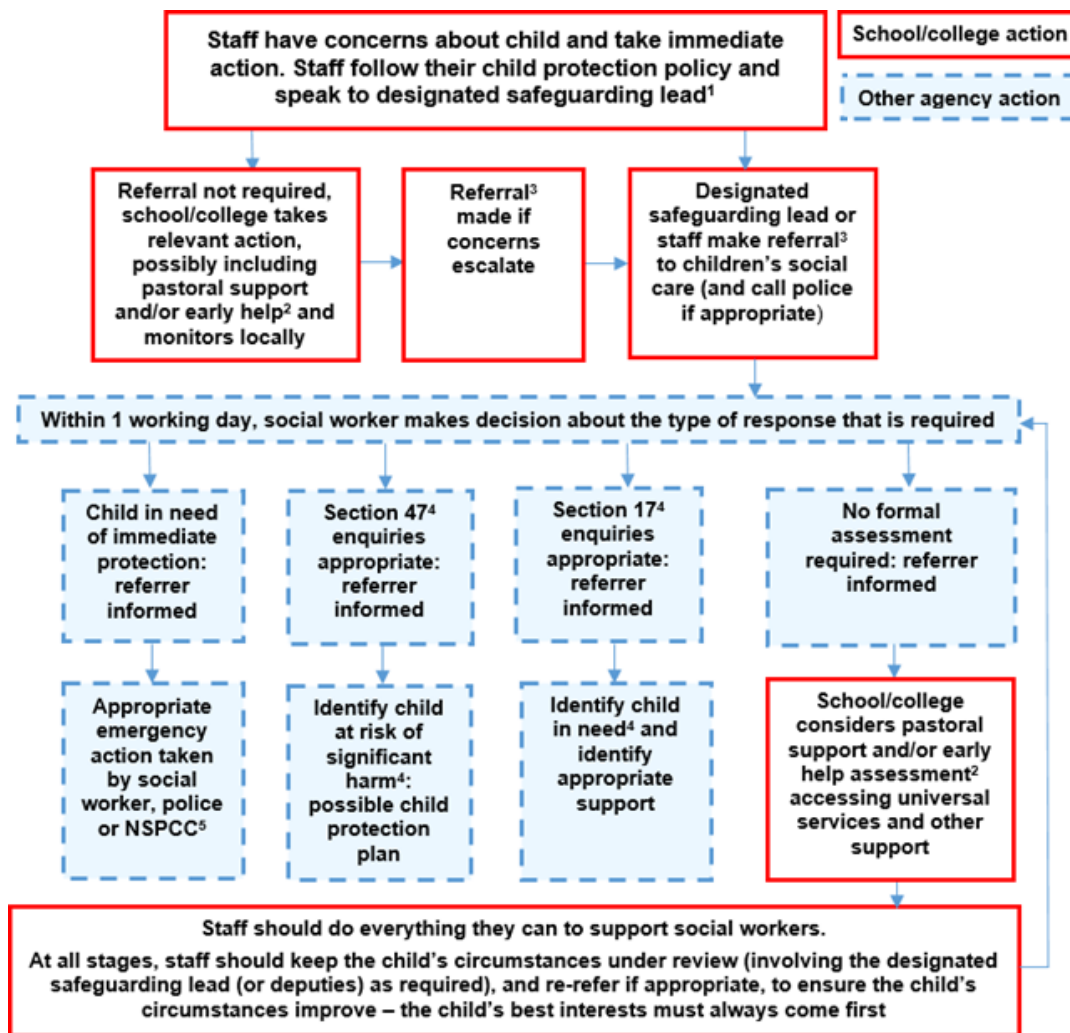

Figure 1: illustrates the procedure to follow if you have any concerns about a child's welfare.

Referral

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

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

The local authority will normally make a decision within 1 working day of a referral about what course of action to take (whether to support through Early Help or expedite for a higher level of support) and should let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. These differ amongst boroughs an information can be found on the MAP/MASH webpage. The key steps are summarised below:

- Stage 1: Discussion with worker from the other agency. Practitioners should always attempt to resolve differences through direct discussion with those involved, but they must be mindful of doing so within a timescale that protects the child from harm.
- Stage 2: Involving the Line Manager or Lead Professional. If the practitioners are unable to resolve differences within an appropriate timescale, or anticipate they will be unable to do so, they should consult a member of senior staff.
- Stage 3: Where differences remain at First Line Management/Lead Professional Level, these should then be escalated to the next level of management within the respective organization.

Further stages in the escalation process are detailed at the link above, but due to the timeline (upwards of 3 months), these would generally be utilised for less immediate issues such as policy change or to address concerns around professional guidance.

Early Help

The school aims to prevent abuse causing trauma to children and so provide an early help pathway to support children and their families. This help could be in a range of forms such as, parent workshops, youth counselling, contact details of other support services and agencies and general care, support and advice.

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

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

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

To make an early help referral, this is once again done via the relevant Local Authority for each child (see contact details above).

Concerns about a staff member, supply teacher or volunteer

Where it is alleged that any person working with children has:

- Behaved in a way that has harmed a child, may have harmed a child, or might lead to a child being harmed.
- Possibly committed or is planning to commit a criminal offence against a child or related to a child.
- Behaved towards a child, children or adult at risk in a way that indicates s/he is or would be unsuitable to work with children.
- Behaved in a way that has harmed, or may have harmed, an adult at risk.
- This applies if the allegation is about a current incident or has occurred historically.

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The person who receives a safeguarding allegation must make a note of the basic details of the allegation, to include the:

- Name of the individual who the allegation is about and any other identifying information, including location.
- Name of any children/adult at risk involved.
- Date and time of the allegation arising.
- Name and contact details of the person making the allegation.
- Key information about the nature of the safeguarding allegation

The headteacher/chair of governors will contact the LADO to seek advice and guidance. Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale. Staff can contact the LADO directly who can advise as appropriate (the number is above and can be found on all school safeguarding posters)

Low Level Concerns

This section is based on concerns that do not meet the harm threshold. This applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold. We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

The term 'Low-Level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that: Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

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

Reporting a low-level concern about a member of staff should be reported to the Headteacher and recorded on the low level concern form (appendix 3). The headteacher will collect evidence where necessary and use the information collected to categorise the type of behaviour and determine any further action.

Allegations of abuse made against other pupils.

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". We also recognise the gendered nature of child-on-child abuse. However, all forms of child-on-child abuse are unacceptable and will be taken seriously. It is important that staff recognise the part they play in proactive prevention and response. Appendix 4 demonstrates how the school creates a supportive environment & minimize risk of child-on-child abuse.

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

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

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

- You must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- The DSL/Headteacher will consider the immediate safety of all pupils concerned and the seriousness and circumstances of the allegation, including the age of the pupils concerned. Usually concerns will be discussed with the family unless such discussion may place the children involved at increased risk of significant harm.

It may be necessary to exclude the pupils concerned (without prejudice) when:

- a serious allegation has been made against a child by another child.
- the pupil's continued presence in the school may have an adverse effect on the complainant and other potential witnesses, and on the promotion of good order and discipline at the school generally.

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

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

You **must not**:

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

- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL. The whole process for this can be found in Appendix 5.

8 Confidentiality

All referrals and safeguarding concerns are stored on the school Child Protection and Online Monitoring System (CPOMS); only the DSL and DDSLs have encrypted access to these. Further information on data protection can be found in the school's Data Protection Policy.

When sharing safeguarding concerns, this is done on a need-to-know basis. Information will be shared with relevant safeguarding partners and other agencies where necessary in a sensitive way following the appropriate procedures for within that borough.

With confidentiality in mind, it is important to consider the following points:

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

    o There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

    o The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

o The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)

- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

- Regarding anonymity, all staff will:

  o Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

  o Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

  o Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff.

9 Notifying Parents

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

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

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

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

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

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

10 Pupils with Special Educational Needs and Disabilities

We recognise that pupils with special educational needs and disabilities (SEND) can face additional safeguarding challenges and are 3 times more likely to be abused than their peers who do not have additional needs. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

As an SEN specialist environment, extra pastoral support for pupils with SEN and disabilities is included within our provision. This includes:

- Visuals and additional communication support to assist children with sharing concerns
- Access to key adults to support mental health and wellbeing, and to provide a safe space to explore safeguarding concerns.
- Arrangements for professional consultations available on request for families; referrals made by school staff when concerns are raised around wellbeing of a child or their family members.
- Ongoing and comprehensive SEMH education for all pupils integrated into the school curriculum, tailored to each pupil's individual needs.

11 Pupils with A Social Worker

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

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

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

12 Looked-After and Previously Looked-After Children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers and relevant virtual school heads.
- We have appointed an appropriately trained teacher to lead on promoting the educational achievement of looked-after and previously looked-after children. Michael Vincent, our Deputy Headteacher, has been assigned this responsibility.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

13 Children Missing Education

It is vital that all children are registered on arrival at school and at the beginning of the afternoon as part of the safeguarding process. Children missing education are at greater risk of abuse. Further information can be found in the Attendance Policy.

Whilst a pupil is excluded from school and remains on the school role, the Designated Safeguarding Lead Team will ensure and that daily communication with the pupil's family to

ensure that there are no concerns regarding the pupil's welfare. Further information can be found in the Exclusion Policy.

14 Online safety and the use of mobile technology

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

To address this, our school aims to:

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

Digital images and photography:

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place regarding our use of digital images and photography. To protect children, we will:

- Seek parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Ensure devices used to take pictures of children to record their work are not to be taken into toilet areas, changing rooms, or used whilst children get dressed for activities such as PE.
- Use only the child's first name with an image outside of the school setting.
- Encourage children to tell us if they are worried about any photographs that are taken of them.

For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to Acceptable Use of ICT Policy, which you can find on our website.

15 Mental Health

Mental health is a state of mental well-being that enables people to cope with the stresses of life, realise their abilities, learn well and work well, and contribute to their community. Staff are encouraged to follow safeguarding referral routes where they have a mental health concern for a student.

16 Physical Safety

Use of 'reasonable force'

There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. All staff are trained in Positive Touch. Further information regarding our approach and expectations can be found in our Behaviour and Relationship Policy.

The Use of Premises by Other Organisations

Where services or activities are provided separately by another body using the school facilities/premises, the headteacher and governing body will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.

Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

Site Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor's badge whilst on site.

Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

17 Work experience

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with the guidance in Keeping Children Safe in Education (2022). Please refer to the Careers Policy.

18 Complaints and Concerns About the School Safeguarding Policies

Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures in the Whistleblowing policy. The school has a 'Whistle-blowing' Policy available to parents, pupils and staff who wish to report concerns. This can be found on the school website.

All reported concerns will be taken seriously and considered within the relevant and appropriate process.

Other complaints

The school has a 'Complaints Procedure' policy available to parents, pupils and staff who wish to report concerns. This can be found on the school website.

All reported concerns will be taken seriously and considered within the relevant and appropriate process.

19 Record-Keeping

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

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

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

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

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

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

● The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

All safeguarding records from April 2020 are stored on the school's CPOMS site.

When sharing information with the Local Authorities and other external agencies, it is recommended to follow guidance on confidentiality.

20 Recruitment and Training

All staff

All staff are recruited using safer recruitment procedures – this means that references and DBS are in place for every member of staff before they take up their post. If in the unlikely case and for any reason there is a delay, e.g. in receiving a reference, then a Risk Assessment (Appendix 7) will be completed.

All recruitment panels have at least one person who has undertaken safer recruitment training. All staff have their details recorded on the Single Central Record. Further information is available in the Safer Recruitment policy.

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

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

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

Regular contractors will also be expected to receive safeguarding training and show proof of this.

Volunteers will receive appropriate training, if applicable.

Further safeguarding training will also take place for all staff on at least a half-termly basis.

The DSL and deputy

The DSL and deputy will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

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

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

21 Monitoring Arrangements

This policy will be reviewed annually by the DSL. At every review, it will be approved by the full governing board.

22 Links with Other Policies and Procedures

This policy links to the following policies and procedures:

- Behaviour and Relationships
- Anti-Bullying
- Staff code of conduct
- Complaints Procedure
- Health and safety
- Attendance
- Exclusion
- E-safety and Acceptable use of ICT
- Equalities
- Sex, Relationship and Health Education
- First aid
- Curriculum
- Privacy notices
- Whistle-blowing
- Mental Health and Wellbeing

Appendix 1 Types of Abuse

The following are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

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

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet) Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

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

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

Appendix 2: Welfare Concern Form

CONFIDENTIAL

Safeguarding & Child Protection Welfare Concern Form

Name of student/s concerned	
Name of adult/s concerned	
Name and Position of person completing form (Please print)	
Date & Time of incident/ concern	
Incident/Concern Report (what)Please use continuation sheet Y/N No: of sheets used ………………………..	
Other relevant information (context of information shared, witnesses, immediate action taken)	

To be passed directly to the DSL or a DDSL in their absence (without delay). Please pass to the Chair of Governors if your concern relates to the Headteacher.		
DSL informed directly:	☐ Yes ☐ No	If No then who?
Signature of reporting person:	Date & Time:	
Contact details:		

To be completed by DSL/DDSL/Chair of Governors

Received by:	☐ DSL	☐ DDSL	☐ Chair of Governors
Immediate Action Taken			
Response/Outcome			
Incident placed on CPOMS:	☐ Yes	Date:	
Signature: ……………………………………………………………………. Date ……………………………………..			

Appendix 3: Low Level Concern Form

This form can be used to share any concern with the Designated Senior Manager/Headteacher, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low-level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

Details of CONCERN :

Name of Staff member :	**Department and Role :**
Signed :	**Time and Date :**

Received by :

At [time] :   **Date :**

WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].

NO ☐ - Give a brief but valid reason/explanation for not;

YES ☐ - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :

ACTION TAKEN :

Was advice/guidance sought from the LADO and or Human Resources? Yes : ☐   No : ☐

Signed :	**Dated :**

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

Appendix 4: Creating a supportive environment in school and minimising the risk of child-on-child abuse

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure pupils know they can talk to staff confidentially by providing sessions around various topics (i.e. anti-bullying, e-safety, etc.) and the pathways they can follow to support with these. Additional safe spaces to share concerns are also provided in therapeutic sessions for the more vulnerable children.
- Maintain high adult ratios within the school allow for ongoing and consistent observation of all children, with multi-disciplinary team meetings taking place regularly to assess the root causes of any changes in behaviour.
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:

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

  o How to facilitate restorative practice to help respond to interpersonal challenges before they escalate further

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

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

- Children can show signs or act in ways they hope adults will notice and react to

- A friend may make a report

- A member of staff may overhear a conversation

- A child's behaviour might indicate that something is wrong

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

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

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

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

o That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

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

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

Appendix 5: Sharing Nudes/Semi-Nudes Process

Initial review meeting

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

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

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

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

If none of the above apply then the DSL, in consultation with other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, please call 999.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationship and Sex Education curriculum and e-safety lessons. Our Wellbeing Curriculum also covers topics that relate to this issue and help provide our pupils with the skills to navigate challenges they might face in relation to it. Teaching covers the following in relation to the sharing of nudes and semi-nudes using resources and terminology adapted to the ages and learning needs of our pupils:

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

The procedure regarding the sharing of inappropriate material via mobile and online technology is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Reporting systems for our pupils

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

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils

- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Ensure every child is well-known by staff within the school environment so that any differences in their presentation can be easily identified
- Provide a range of appropriate visuals for children with social-communication or language challenges
- Facilitate frequent and regular access to one of the school's mental health professionals for pupils that are identified as demonstrating poor mental health or any indicators of abuse
- Display visuals identifying trusted adults appropriate to each cohort within their classrooms

Appendix 6: Online Safety - The 4 key categories of risk

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

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

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

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

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

    o Staff are allowed to bring their personal phones to school for their own use during non-contact time when pupils are not present. Staff members' are expected to keep their personal phones put away in a secure location during contact time with pupils

- Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out a regular review of our approach to online safety, supported by an risk assessment that considers and reflects the risks faced by our school community
- Prohibit children from bringing mobile phones or any electronic devices (excluding AAC devices) to school without permission from the Headteacher. Phones and electronic devices are not permitted to be kept in the possession of any pupil when on-site, and there are further details about these procedures within our E-safety & Acceptable Use of ICT Policy.

Appendix 7: Safer Recruitment Risk Assessment

Risk Assessment

Individuals should only be allowed to commence working with children in those extenuating circumstances where the needs of service provision outweigh the risk as assessed below. This template should be used by the responsible manager to assess and, where appropriate, manage any risk in such circumstances. Reference should also be made to the DfE statutory guidance *Keeping Children Safe in Education* which states that where an individual is allowed to start work in Regulated Activity before the DBS is available the school/college should ensure the individual is appropriately supervised and that all other checks – including a separate barred list check – have been completed.

For advice on completing this form:

SE4S DBS customers please email dbs@strictlyeducation4s.co.uk **or telephone 0800 073 4444**

SE DBS customers please email dbs@strictlyeducation.co.uk **or telephone 0330 123 2549**

Risk Assessment For (Employee Name)		Post	
School / Organisation (or proposed location if different)		Name of Manager	

Using this audit tool:

1. **The questions are designed to ensure you consider all relevant components in your risk assessment so please answer all the questions and record your answer by ticking the appropriate box.**
2. **You should specifically relate your assessment to the individual job role and the context within which it is performed.**
3. **You should consider the risk both in relation to the magnitude of impact should the individual reoffend and the likelihood of the individual reoffending.**
4. **The answer to each question will provide an indication of the potential risk thus helping your assessment.**
5. **If an offence occurred outside of the UK please take time to consider whether the offence is actually unlawful within the UK. For example, consensual sex between men is unlawful in some countries but no longer in the UK.**

PART ONE: Prior to allowing an individual to commence working with children before a DBS clearance has been received the following must be obtained.		
Please initial and date each element:	**Initial**	**Date**
a) **A check against the Children's Barred List** (this **MUST** be undertaken before an individual commences)		
b) **A completed DBS application form with the individual's signed criminal record self declaration**		
c) **References which are satisfactory to the school/college/organisation**		
d) **A qualification check where a qualification is mandatory**		
e) **Appropriate checks where an individual has worked/lived overseas**		
f) **Confirmation of current eligibility to work in UK**		
g) **Any gaps in the individual's employment history must have been reasonably accounted for**		

Factor	Low to Medium Risk	Medium to High Risk

1. Has the applicant declared a conviction/caution/warning that is not "protected" as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended)*? **If YES please complete questions 2-9** **If NO please go to question 8** * *See Appendix B for summary of filtering rules*		
2. Was the offence related to children / vulnerable adults?		
3. Does the offence/information include any of the following: Sexual offences Violence / ass Drugs Arson Mental ill health issues Fraud or pecu Theft		
4. The relevance of the offence/information to the duties required of the post-holder including: • Will there be unsupervised access to children? • Will there be access to sensitive personal data? • Does the post involve financial or property responsibilities?		
5. Is the conviction 'spent' under the Rehabilitation of Offenders Act 1974? (See Appendix A)		
6. Whether the offence appeared to be a one-off or part of a history of offending.		
7. If the offence was committed in another country, whether it is an offence in England and Wales.		
8. Does the job involve unsupervised access to children?		

9. Does the job involve unsupervised access to information concerning children?		
10. Has the individual provided a copy of a previous CRB/DBS disclosure?		
11. Has the individual previously worked with children?		
12. Do the references provide satisfactory confirmation of the individual's experience and suitability of working with children?		

Line Manager Declaration:

1. I accept responsibility for managing this individual's work.

2. I confirm that this individual will receive instructions on the confidentiality policies and child protection practices appropriate to their role as part of their induction.

3. I confirm that I will ensure that this individual will have appropriate supervision when working with children and that I will implement and monitor a risk management plan which, where appropriate, will include screening incoming and outgoing work carried out by this individual to ensure that no sensitive or confidential information about children or their families is accessed unsupervised by this individual until their DBS disclosure is received.

Signature of Responsible Manager		**Date of Risk Assessment**	

PART TWO: RISK MANAGEMENT PLAN
Having considered your answers to the questions above, please use this box to indicate any identified hazards and your assessment of any risks. Please clearly set out your plan and indicate the name and contact details of anyone else involved in the implementation and monitoring of this plan and to whom a copy of this risk management plan will be sent.
Please summarise your discussions with the individual and any other discussions you may have had with Strictly Education 4S and/or counter signatory. *Examples of information/issues to be discussed and recorded:*

The circumstances which led to the offence being committed; whether the individual circumstances have changed since the offence was committed making re-offending less likely. The degree of remorse, or otherwise, expressed by the individual and their motivation to change. *Exceptionally, further information may be explored with local police records via the relevant Safeguarding Team.*
Employee Declaration: **I confirm that I have read and understood the plan as set out above and that I will comply with its implementation and monitoring.**

Signature of Employee	

(A copy should be retained on the individual's personnel file)

Appendix 8: Support Organisations

NSPCC 'Report Abuse in Education' Helpline - 0800 136 663 or help@nspcc.org.uk

National Organisations - NSPCC: www.nspcc.org.uk , Barnardo's: www.barnardos.org.uk, Action for Children: www.actionforchildren.org.uk, Children's Society: www.childrenssociety.org.uk

Support for Staff - Education Support Partnership: www.educationsupportpartnership.org.uk, Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners - ChildLine: www.childline.org.uk, Papyrus: www.papyrus-uk.org, The Mix: www.themix.org.uk, Shout: www.giveusashout.org, Fearless: www.fearless.org, Victim Support: www.victimsupport.org.uk

Support for Adults - Family Lives: www.familylives.org.uk, Crime Stoppers: www.crimestoppers-uk.org, Victim Support: www.victimsupport.org.uk, The Samaritans: www.samaritans.org, NAPAC (National Association for People Abused in Childhood): www.napac.org.uk, MOSAC: www.mosac.org.uk, Action Fraud: www.actionfraud.police.uk, Shout: www.giveusashout.org, Advice now: www.advicenow.org.uk

Support for Learning Disabilities - Respond: www.respond.org.uk, Mencap: www.mencap.org.uk, Council for Disabled Children: https://councilfordisabledchildren.org.uk

Contextual Safeguarding Network - https://contextualsafeguarding.org.uk/

Substance Misuse - We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/ , Talk to Frank: www.talktofrank.com