

Newhaven School : Child Protection Policy 2020 - 2021

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Agreed by Governors: agreed at Management Committee Meeting Sept 2020

Staff training on policy: 2nd September, 2020

Frequency of Review: Annually or more frequently

Date of Next Review: October 2021

Staff management Committee:

Designation	Staff/Management Committee	Contact
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Child Protection Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. This is particularly important in our school as we know that abuse of our cohort is significantly higher than national averages. We are also mindful that we do not miss abusive and dangerous behaviour due to our high levels of exposure to it and that we treat each concern very seriously. We also encourage a culture of listening to children and taking account of their wishes and feelings in any measures we put in place to protect them. We endeavour to provide a safe and

welcoming environment where children are respected and valued by recognising the risks of failing to take the right action at the right time and ensuring we:

1. Act on and refer the early signs of abuse and neglect.
2. Listen to the views of the child.
3. Keep detailed and accurate records.
4. Monitor and re-address concerns where situations do not improve.
5. Share information promptly and appropriately.
6. Challenge those who do not appear to be taking any or appropriate action.

The policy provides information regarding different types of abuse, links to statutory and non-statutory documentation and outlines our procedures which ensure our children receive effective support, protection and justice.

Introduction

The procedures contained in this policy apply to all staff (including temporary and voluntary as well as permanent) and management committee members and are consistent with those of the Greenwich Safeguarding Children's Partnerships (GSCP) and locally agreed procedures.

Newhaven takes seriously its responsibility to protect and safeguard the children in its care and follows the guidance of "Working Together to Safeguard Children (2018)" and "Keeping Children Safe in Education" (September 2020) as well as other relevant national legislation and guidance and local procedures and protocols as published by the Greenwich Safeguarding Children's Partnerships (GSCP)

The school will support the pupils in their understanding of staying safe when using new technology (in accordance with the DfE guidance published in June 2019 'Teaching online safety in schools'). Pupils will be supported in their understanding of personal safety through the broad curricular offer and the PSHE curriculum. (Note: The teaching of Relationships Education (primary), Relationships and Sex Education (RSE) and Health Education (secondary) is encouraged from September 2019 but will be compulsory from 2020).

Legislation and statutory guidance

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

Context

Newhaven has a cohort of students that are particularly vulnerable to abuse and neglect. In 2017-18, 36% of students had an active social services or early help intervention and a further 38% had previously active interventions or had been raised as an ongoing concern which did not meet thresholds. Our students are particularly vulnerable to grooming and therefore exploitation. In the local context, we also pay regard to the GSCP priorities of children in families affected by the 'toxic trio' of domestic abuse, parental mental ill health and substance misuse, neglect, child sexual exploitation harmful sexual behaviours and gang related issues.

Guidance in all these areas is available from www.greenwichsafeguardingchildren.org.uk Furthermore, whilst we work hard to protect children from all risk, we pay regard to the national foci of child sexual exploitation, peer on peer abuse, online safety, radicalisation and female genital mutilation.

1 Purpose and Aims

1.1 Newhaven School fully recognises its responsibilities for safeguarding children including those in need of protection.

1.2 Our policy applies to all staff, management committee, volunteers and other adults working in the school and aims to ensure consistent good practice across the school and demonstrate our commitment to protecting children.

1.2(a) Principles and values

- Children have a right to feel secure and cannot learn effectively unless they do.
- All children have a right to be protected from harm.
- All staff, volunteers and governors have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account *contextual safeguarding*, in accordance with the guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.
- Whilst the school will work openly with parents and carers as far as possible, it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believe

- d to be in the child's best interests

1.3 There are five main elements to our policy:

Safer Recruitment: Ensuring we practice safe recruitment in line with national legislation by using at least one suitably trained recruiter on all interview panels and by checking the suitability of staff and volunteers to work with children and ensuring any unsuitable behaviour is reported and managed using the allegations management procedures.

Prevention: By creating a positive school atmosphere where students are encouraged to talk and maintaining the thought in all staff that it could happen here. We also carry out risk assessments of students where necessary, risk assessing educational visits and ensure a suitably trained workforce. We also ensure that students understand the nature of safeguarding risks through the RSHE and e-safety curricula, targeted assemblies and outside groups.

Working with pupils: Raising awareness of child protection issues and equipping children with the skills needed to keep them safe by ensuring they know the identity of the DSLs, making sure that students have access to adults in the school including pastoral managers, mentors at Gardens and NEST and tutors at King's Park. Also, we ensure children are listened to through the school council.

Protection: By ensuring that all staff follow the procedures outlined in this policy and that they are trained and supported appropriately and sensitively in safeguarding matters.

Support: (to pupils and staff, including those who are survivors of abuse). We support students who have been abused in accordance to their child protection plans and carry out all actions agreed with other professionals that ensure the safety and appropriate development of students.

1.4 We are particularly alert to the potential need for early help for children who:

- Are disabled and have additional educational needs.
- Have special educational needs.
- Are young carers
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing or go missing from care or a care home
- Are at risk of modern slavery, trafficking or modern slavery
- Are at risk of being radicalised or exploited
- Are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Are misusing drugs or alcohol themselves
- Have returned home from care
- Are privately fostered

1.5 With regards to children with identified SEND including but not exclusive to those with EHCPs and particularly with regard to the large cohort at the school with ASD diagnoses, staff should be aware of the additional safeguarding needs presented by them. Key elements are:

- We do not assume that indicators of possible abuse such as behaviour, mood or injury are related to the child's SEN.
- We are aware that students with SEN may be severely impacted by behaviours such as bullying without showing any outward signs.
- We provide opportunities for all students to communicate their needs and concerns and that this may take additional strategies such as talking mats and comic strip conversations.
- That we are aware that there is a risk on overreliance on parents as experts.

1.6 We are also acutely aware that children can abuse their peers. Staff should raise concerns in this area as soon as they have them and never dismiss abusive behaviours

2. More specifically actions which:

2.1 Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL or a deputy DSL. Including having a comprehensive induction policy in place specifically outlining the school Safeguarding/CP policy; the staff code of conduct; acceptable use (ICT including mobile phones and cameras); school behaviour policy; the safeguarding response to children who go missing from education and identity and role of the DSL

2.1a Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL and have signed that they have read Keeping Children Safe in Education (September 2019) Annex A and Part 1;

2.2 Ensure that all visitors to the school are aware of safeguarding procedures within the school by issuing them a leaflet outlining key staff and procedures on arrival at the school.

2.3 Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in any school prospectus and on the website.

2.4 Notify Social Care immediately (on the first day of absence) if there is an unexplained absence of a child on a Child Protection Plan

2.5 Contact the child's social worker directly if there is an unexplained absence of a child who is Looked After. This may then trigger actions identified in the "Joint Police and Social Care Protocol for Dealing with Children Missing from Care"

2.6 Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.

2.7 Keep detailed, accurate, secure written records of concerns about children, even where there is no need to refer the matter immediately (see document Child protection Records at Newhaven available from the DSL and in AAA Child protection folder in the staff network area)

2.8 Ensure all safeguarding and child protection records are kept securely, separate from the main pupil file, and in locked locations.

2.9 Follow the procedures set out in this document, if an allegation is made against a member of staff or volunteer.

2.10 Ensure safe recruitment practices are always followed.

2.11 Ensure clear protocols are in place for the appropriate supervision of visitors (including visiting speakers/educators) and that the school's values and British Values are upheld.

2.12 Have procedures in place to gather and respond to the views and/or concerns of pupils

2.13 Seek to hold more than one emergency contact number for each pupil

3 Safeguarding Training

3.1 The Head Teacher will undertake training on child protection to level 2 at least every 2 years or as and when required by new legislation and guidance.

3.2 The DSL will attend the GSCB Level 2 "Working Together to Safeguard Children" training and Prevent Training and then undertake refresher safeguarding training at least every two years.

3.3 The Deputy DSLs and CP admin officers will also attend training to at least level 2.

3.4 Any newly appointed DSL will attend the GSCB Level 2 "Working Together to Safeguard Children" training and the local DSL training before taking lead responsibility for safeguarding. A deputy DSL will take the lead role on safeguarding for the short time that the DSL is waiting to receive training.

3.5 The designated Management Committee member for Safeguarding and Child Protection will undertake governor safeguarding training annually.

3.6 All members of staff will receive regular training on child protection and safeguarding annually and regular updates through email or staff meetings from the DSL.

3.7 All staff should identify students where they are concerned that they might need early help. This means that there are concerns but that these don't necessarily meet the thresholds for child protection incidents. These concerns should be raised in daily debriefs, with pastoral manager or on a Newhaven concern form given to the DSL or a deputy DSL (see appendix).

3.8 All new members of staff will receive child protection training from the DSL as part of their induction programme

3.9 Briefings and updates on child protection and safeguarding procedures will be provided by the DSL on a regular basis, at least annually, but more frequently when necessary, to ensure that all members of staff are familiar with any changes to the school policy or in the national guidance materials as they occur.

3.10 The Head Teacher and DSL will assure that at least one member of every appointments panel will have gained accreditation through Safer Recruitment training.

3.11 The DSL will retain a training record indicating the attendance at safeguarding training so that absent staff can receive an update on their return. Additionally, the DSL will retain a record showing staff have read Keeping Children Safe in Education (September 2020) Annex A and Part 1.

4 The Head Teacher's Roles and Responsibilities:

4.1 The Head Teacher should read and understand Keeping children safe in education and ensure that it is followed by the Designated Safeguarding Lead and all other staff.

4.2 The Head teacher should ensure that the policies and procedures relating to safeguarding, adopted by the management committee, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.

4.3 The Head Teacher should ensure that the DSL, all deputy DSLs and the admin staff handling safeguarding information are trained to the appropriate level and frequency.

4.4 To ensure that the designated safeguarding lead and any deputies should liaise with the local authority and work with other agencies in line with Working together to safeguard children.

4.5 To ensure that the school has appropriate safeguarding responses to children who go missing in education (CME), particularly on repeat occasions.

4.6 To ensure children are taught about safeguarding, including online and Relationship and Sex Education (RSE), through teaching and learning opportunities, as part of providing a broad and balanced curriculum through the areas of RHSE and ICT as well as other opportunities.

4.7 To ensure that the schools ICT systems are protected from potentially harmful and inappropriate material on line through appropriate filtering and monitoring systems.

4.8 Induction procedures are robust and meet the requirements outlined in KCSIE 2020

4.9 Procedures are in place to refer to DBS any person dismissed or removed due to safeguarding concerns.

4.10 The school is satisfied that any alternative provider used by the school has appropriate safeguarding procedures in place.

5 The Designated Safeguarding Lead's and Deputy DSLs' Roles & Responsibilities

5.1 All staff members should receive appropriate safeguarding and child protection training which is regularly updated and at least annually. In addition all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

5.2 To ensure they have updated DSL training to level 2 at least every 2 years and that deputy DSLs have the same.

5.3 To oversee all Child Protection referrals to the Greenwich MASH.

5.4 To ensure that either the DSL or a deputy DSL are always available during school hours for staff to discuss safeguarding concerns. This may be by telephone.

5.5 At Newhaven, whilst there are several (see above) deputy DSLs, the ultimate lead responsibility for safeguarding and child protection remains with the designated safeguarding lead.

5.6 Deputy DSLs can carry out any of the functions of the DSL under their supervision.

5.7 The DSL chairs a three weekly meeting (the pastoral review team) with all DSLs as possible but at least where a DSL from Gardens, NEST and Kings Park are present. At this meeting all children with active social care involvement, early help intervention or active safeguarding concerns are discussed and actions agreed.

5.8 If a child is categorised as a concern or has early help intervention then the DSL should ensure that they are kept under constant review and referred to children's social care if necessary. A concern includes children with historic social care intervention or children where staff are worried that they may but they don't yet meet thresholds for early help or social care intervention.

5.8 If, after a referral, the child's situation does not appear to be improving, the designated safeguarding lead (or the person who made the referral) as directed by the DSL should press children's services for reconsideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

5.9 If the school disagrees with a decision made by children's social care, this is discussed at the Pastoral Review Team meeting, and then the Greenwich Safeguarding Children Board escalation policy (see staff area AAA Child Protection folder) may be used to challenge the decision.

5.10 If the DSL discovers in the course of their work that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 then they must report it to the police.

5.11 Further guidance on specific issues should be sought from:

<https://www.greenwicksafeguardingchildren.org.uk/>

<https://www.greenwicksafeguardingchildren.org.uk/about-us/greenwich-safeguarding-children-partnership/>

5.12 Ensure all staff are aware of the guidance 'What to do if you're worried a Child is being Abused'; Feedback and reassure staff who have raised a child protection concern;

5.13 Be able to keep detailed, accurate, secure written records of referrals and/or concerns

5.14 Maintain an up-to-date awareness of safeguarding developments and distribute these as appropriate to all staff in line with advice from the Greenwich Safeguarding Children's Partnership (GSCP);

5.15 Have attended Prevent Awareness training (Heather Hutchings Prevent Education Officer RBG 0208 921 8325)

5.16 Ensure the establishment's child protection policy and procedures are updated and reviewed annually and work with the governing body, management committee or proprietor regarding this

5.17 Ensure parents can see copies of the child protection policy and procedures which alerts them to the fact that referrals about suspected abuse or neglect may be made and the role of the establishment in this. (Schools may want to consider devising a parent/child friendly CP summary policy)

5.18 Where children leave the establishment ensure their child protection file is provided (with a receipt obtained) for any new establishment as soon as possible but transferred separately and securely from the main pupil file.

6 The Management Committee's Roles & Responsibilities re Safeguarding

6.1 Members of the management committee should read, understand and apply their statutory responsibilities described in Keeping Children Safe in Education (Sept 2019) with regards policies, procedures and training comply to the law at all times.

6.2 A senior member of staff must be appointed to take leadership responsibility for Newhaven's safeguarding arrangements. This designated safeguarding lead must have the role explicitly mentioned in their job description.

6.3 The management committee should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. This includes an effective child protection policy, and a staff code of conduct which includes staff/pupil relationships and communications including the use of social media.

6.6 The management committee should ensure that all staff members undergo safeguarding and child protection training at induction and at least annually and that they this refers to Looked after Children so staff have the information and skills they need. The training should be in line with advice from the Greenwich Safeguarding Children's Partnership (GSCP)

6.6 In addition all staff members should receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

6.7 The management committee should ensure that opportunity is provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

6.8 The management committee should ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

6.9 The management committee should ensure appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, are in place to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

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

6.11 To ensure that all guidance relating to the safer recruitment of staff under Section 3 of Keeping Children safe in education (Sept 2020) is in place in Newhaven and that all appointment panels have at least one member who has received safer recruitment training.

6.12 The management committee should ensure there are procedures in place to handle allegations against teachers, the Head Teacher, volunteers and other staff. Such allegations should be referred to the local authority by the appropriate person. A member of the Management Committee (usually the chair) is nominated to be responsible for liaising with the Local Authority Designated Officer (LADO) in the event of allegations of abuse being made against the Head Teacher

6.13 The management committee must ensure that the school makes a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

6.14 The management committee should ensure this child protection policy includes procedures to minimise the risk of peer on peer abuse and sets out how allegations of peer on peer abuse will be investigated and dealt with. The policy should reflect the different forms peer on peer abuse can take, make clear that abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. It should be clear as to how victims of peer on peer abuse will be supported.

6.15 The management committee should ensure that the peer on peer abuse element of this policy should include procedures for dealing with sexting and upskirting (Voyeurism (Offences) Act 2019)

6.16 The management committee should ensure that all processes to deal with CP concerns have the interests and the wishes of the child at their heart.

6.17 They should also ensure that a person with the appropriate skills is appointed as designated teacher for Looked After Children and that they liaise with the virtual head for Lacs to ensure that additional funding is best used to meet these children’s needs.

7 The Role & Responsibilities of all Staff within School

7.1 All staff have a responsibility to provide a safe environment in which children can learn.

7.2. All school and college staff should be prepared to identify children who may benefit from early help (see above). This means they must discuss concerns with a member of the pastoral team as soon as they emerge in a child's life.

7.3. Any staff member who has a concern about a child's welfare should follow the referral processes set out in this policy and the leaflet 'Newhaven School- Safeguarding and Child Protection Procedures'. Staff may also be required to support social workers and other agencies following any referral.

7.4 All staff must be aware of, understand and follow the child protection procedures within Newhaven School. To ensure this they must read, understand and follow:

- The Child Protection Policy
- Keeping Children safe in Education Part 1 (Sept 2020)
- What to do if you are worried a child is being abused (March 2015)
- The Staff Code of Conduct
- The Behaviour Policy
- Educational Visits Policy

Copies of these documents are available on the school website and the staff shared area in the folder **AAA Child Protection**.

7.5. All staff members should attend appropriate safeguarding and child protection training which is updated at least annually as well as being part of induction for new staff. If this is not the case, you should arrange a time for this training with the DSL.

7.6 At Newhaven, staff will not normally make a direct referral to children's social care but this may happen in extremely rare circumstances (see referral procedures below). As a result, all staff should be aware of the process for making referrals to children's social care. If staff do make a referral, they must inform the safeguarding lead as soon as possible.

7.7 All staff should know what to do if a child tells them he/she is being abused or neglected. This includes maintaining appropriate confidentiality and liaison with appropriate professionals. Staff should never promise confidentiality (see below).

7.8 Any concern that may mean a child is at risk of harm **must** be reported to the DSL, Deputy DSL or pastoral team staff before that child leaves the school premises for the day.

7.9 All staff members should be aware of the types of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Types of abuse and neglect identifying signs are described in KCSIE (2020) and 'What to do if you are worried a child is being abused'.

The four categories of abuse are as follows:

Neglect

Physical abuse

Sexual abuse

Emotional abuse

7.10 Staff must maintain an attitude of 'it could happen here' and not allow the high levels of risk and risk taking behaviours of our students become normalised to them.

7.11 All concerns and discussions raised by staff must be followed up in writing to the DSL using a CP concern form (**Staff area, AAA Child protection**). A record of any bruises, cuts or marks described on a child should be made on a body map attached to this form (**staff area, AAA Child protection**).

7.12 If a teacher discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 then they must report this to the police. This should be done in consultation with the DSL. The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendices.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM] must speak to the DSL and follow our local safeguarding procedures.

7.13 If you have concerns about extremism

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

7.13 If you have a mental health concern

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. Staff should be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. All staff have an important role to play in supporting the mental health and well-being of pupils and identifying safeguarding concerns. (Also see *DFE Mental Health and Behaviour*) If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following Newhaven safeguarding steps and alerting the DSL.

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

7.14 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 peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, or our Sexual Harassment Policy but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

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

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.

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualized or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by [insert your procedures for making pupils aware of this here]
- Ensuring staff are trained to understand 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

All of the above should be considered in light of our existing Behaviour Policy and Sexual Harassment Policy)

7.15 Sexting

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

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This 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 imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)

- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the 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 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 imagery 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 imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Head Teacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care but may choose to carry out further interviews to ascertain whether a pupil has been harmed or is at risk of harm

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the Safer Schools Liaison Officer or by calling the Emergency Services

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in this policy also apply to recording incidents of sexting.

Curriculum coverage

Sexting will also be covered within RHSE and its impact, the law and the school's policy, including procedures outlined

7.13 All staff and volunteers have a duty to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

8 Royal Greenwich Guidance

8.1 School staff, parents and young people seeking further advice and guidance on a wide range of issues relating to safeguarding children and child protection (including procedures and protocols for Greenwich) can find it at the Greenwich Safeguarding Children's Partnership website by following the link below.

www.greenwichsafeguardingchildren.org.uk

9 When to be concerned

9.1 There are two times when staff or volunteers should be concerned. One is when a child has disclosed some kind of abuse or concern is such that it is a risk that a child is being abused or is at risk of abuse and action needs to be taken immediately. The other is when staff or volunteers have a concern over time that all is not right with a child. They may not be able to pin down exactly what the problem is but should raise the concern all the same.

9.2 All staff and volunteers must be aware that the main categories of abuse are and the indicators and signs of abuse:

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.

The four categories of abuse are as follows:

Neglect

Physical abuse

Sexual abuse

Emotional abuse

Staff should also be aware of Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children. Children includes everyone under the age of 18.

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

9.3 All staff and volunteers must act in accordance with this policy and refer to the DSL or deputy DSL if a child presents with indicators of abuse (see 'Keeping Children safe in Education 2019' and 'What to do if you think a child is being abused').

9.4 Staff must be aware of the prevalence of peer on peer abuse. This may be verbal or physical in school but can also include all the categories of abuse outlined above. It may include, online abuse, sexting and 'upskirting' (typically involves taking pictures under a person's clothing without them knowing) which is now a classified criminal offence (Voyeurism (Offences) Act 2019)

9.5 Staff must be aware of all types of equalities based abuse such as homophobia, racism and sexism. These must be challenged and reported appropriately and should not be passed off as 'banter' or 'part of growing up'.

10 Dealing with a Disclosure

10.1 (a) If a child discloses that he or she has been abused in some way the member of staff should seek out the DSL or deputy DSL immediately. You should not cut off the child in mid flow but use the following guidelines if a child is disclosing to you:

Responding to a disclosure; Advice and guidance

As a teacher receiving a disclosure first hand it is normal to feel overwhelmed and confused. So, care must be taken to remain calm and to show support to the child throughout the disclosure phase.

Sometimes children choose to disclose concerns through a third party such as a friend 'telling' on their behalf, or indirectly e.g. sounding out information and reaction by asking 'what if my friend.....?' If such concerns arise they should be taken equally seriously and be followed up with the DSL in the same manner as a direct disclosure. Children may also seek to disclose and share their experiences through drawings, writing and play. If concerns arise, it is appropriate to talk further with the child to allow wider discussion and clarification. This might involve inviting the child to 'tell me more about what is happening in your picture' / story / game"

The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

Receive:

Listen to what is being said without displaying shock or disbelief. Accept what is being said and allow the child to speak without judgement and demonstrate that you are taking it seriously. Listen and reflect back, avoid any leading questions.

Reassure:

Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously. Don't promise confidentiality – never agree to keep secrets.

Tell them that you will need to report it to a member of the Safeguarding Team whose job it is to protect children. Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

React:

Listen quietly, carefully and patiently. Do not assume anything – don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions.

Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English. Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to.

Record:

Make some very brief notes at the time and write them up in detail as soon as possible using the CP Form located in AAA Child Protection (on the staff drive)

Do not destroy your original notes in case they are required by a Court. Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used; including any swear words or slang. Record statements and observable things, not your interpretations or assumptions – keep it factual.

Refer:

Refer directly to the named child protection officer or designated person in your organisation (as set out in the organisation's child protection policy). Please make sure you refer by the end of the working day - if a child is in immediate harm or danger they should not leave the site until a member of the Safeguarding Team has spoken with them. Do not discuss the case with anyone outside the child protection team this includes parents until directed by the DSL or member of the Safeguarding Team.

Further support for disclosures

The following are examples of possible responses to a disclosure opposed to these being compulsory responses:

"Thank you for bringing this to my attention, we need to discuss this further shall we go (safe space). Please be aware anything we discuss will be brought to the attention of SLT, this is to keep you and others safe. I will listen to you now"

“I am so sorry that this has happened and I believe you. We will take this seriously. We will do whatever we can to help you get the support you need”

“You did the right thing telling us about this. You are not to blame for this happening. We will do whatever we can to help you get the support you need and in order to do this and ensure you are safe, I will have to share this information with the designated safeguarding lead”

“I want to make you aware that If you share any information which tells me that yourself or a young person is in danger of being, or has been harmed, I do have to share that. However, if that is the case I will tell you that I am going to do so and who I will tell. I will not share information unless I am legally required to do so”

Do ask open questions like "Is there anything else that you want to tell me?"

10.1 (b) Further advice on record keeping

Make records that are factual, accurate and relevant and avoid subjective judgements. It is not the school's responsibility to 'check out' what any child tells nor should any abuser be questioned. Please ensure that the following information is recorded:

- time, date, place and people who were present
- exact details of what was said the by the child and/or others (no interpretation or opinion)
- the child's emotional or physical condition
- details of the behaviour(s) causing concern and the context in which it occurred
- details of injuries, marks or bruises - the position of these must be marked on the appropriate body drawing and suitably annotated to provide further detail (number, length of marks, description of marks, colour of marks/bruises etc.)(see appendix and starr area AAA Child protection.)
- Speak with the Designated Safeguarding Lead, and provide them with the signed, dated written record, using the Newhaven child protection concern proforma, without delay. This must be before the end of the school day and before the child has left the school premises if any risk may be current.

10.2 If staff or volunteers are concerned about a child over a period of time that all is not right with a child but have no specific disclosure or other evidence then they should discuss this as soon as possible with the DSL or deputy DSL.

10.3 The same approach to receiving a disclosure must be taken if the discloser is not the allegedly abused child but another child or an adult.

10.4 When the DSL, or in his/her absence, the Deputy DSL, has been informed, he/she will make the decision whether or not to refer the concern to Social Care. The Multi Agency Safeguarding Hub (MASH) will be consulted when there is uncertainty about whether to refer. Referrals to the MASH can be made by other staff in an emergency situation where the DSL and Deputy DSL are not available. In the case of another member of staff making the referral, the DSL must be informed as soon as possible.

10.5 Referrals will be made as soon as possible by telephone and the appropriate forms completed and sent at the same time (at longest 24 hours after the initial telephone referral)

MASH Consultation Line Tel- 0208 921 2267 or contact

LADO/Greenwich Safeguarding Coordinator for Schools on 0208 921 3930

Referrals to Children's Social Care must be made to the **Multi Agency Safeguarding Hub (MASH)**

Tel 0208 921 3172.

Emergency Duty Team (out of office hours only): 020 8854 8888

Email: mash-referrals@royalgreenwich.gov.uk

Multi Agency Safeguarding Hub Children's Services' Safeguarding and Social Care,
1st Floor The Woolwich Centre,
Wellington Street,
Woolwich,
London
SE18 6HQ

11 Confidentiality

11.1 Safeguarding children raises issues of confidentiality that must be clearly understood by all staff / volunteers in school. All staff/volunteers in school have a responsibility to share relevant information about the protection of children with other professionals. 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

This sharing of information is outlined in the guidance 'Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers' (July 2018). It identifies seven golden rules for sharing information and reminds practitioners that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

11.2 If a child discloses to a member of staff/volunteer and asks that the information is kept secret, it is important that the member of staff / volunteer tells the child in a manner appropriate to the child's age / stage of development that they cannot promise complete confidentiality – instead he/she must explain that he/she may need to pass information to other professionals to help keep the child or other children safe.

11.3 Staff / volunteers who receive information about children and their families in the course of their work shall share that information only within appropriate contexts.

11.4 If staff (including agency staff) are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

12 Communication with Parents

12.1 Parents and carers will be made aware of the school/service policy through published information and in initial meetings with parent and carers of new children. Parents and carers will be informed that in certain circumstances there may be a need to contact other agencies without first notifying them. This decision will be made in partnership between Education Services and Social Care. It will be made clear that this is a legal obligation and not a personal decision.

12.2 Parents must be informed of any decision to refer to social services unless it is considered that this will put the child at further risk. The decision on whether to inform parents and at which point in the process will be made by the DSL or deputy DSL.

12.3 The Management Committee makes this policy available to parents, carers and children through the school website. A hard copy is also available on request.

13 Record Keeping

13.1 The completed forms/records will be kept for the duration of the child's school career and where a child changes school the forms/records will be forwarded to the Link Teacher at the receiving school. The school will retain a receipt for the records signed by the receiving school.

13.2 The information contained will be regarded as confidential. Any request for access to the information by non-Greenwich Safeguarding Children's Partnership Agencies (e.g. Solicitor, investigating agent) will be referred to the Head Teacher/DSL who is advised to seek legal advice before acting.

13.3 Records should be kept in line with the document Child Protection Records at Newhaven 2018-19 (see folder AAA CP folder staff area).

14 Dealing with Allegations against School Staff: Whistleblowing (also see KCSIE Sept 2019 Part 4)

14.1 If staff members have concerns about another staff member, then this should be referred to the Head Teacher. Where there are concerns about the Head Teacher, this should be referred to the chair of the management committee.

14.2 A concern is any information which indicates that a member of staff /volunteer may have:

- Behaved in a way that has, or may have, harmed a child
- Possibly committed a criminal offence against or in relation to a child
- Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children.
- Behaved in a way contrary to the Staff code of conduct

14.3 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

14.4 If a staff member feels unable to raise an issue through the procedures outlined above, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance at www.gov.uk/whistleblowing
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday or email: help@nspcc.org.uk

14.5 This applies to any child the member of staff / volunteer has contact with in their personal, professional or community life.

14.6 To reduce the risk of allegations, all staff and volunteers must be aware of safer working practice and follow the school's code of conduct.

14.7 The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality must not be promised and the person must be advised that the concern will be shared on a 'need to know' basis only.

14.8 Actions to be taken include making an immediate accurate, written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record must be signed, dated and immediately passed to the Head Teacher or chair of the management committee if the allegation is against the Head Teacher.

14.9 The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

14.10 The Head Teacher/ chair of the management committee will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO) for Education, who is (0208 921 2351 or 07566287413); Winsome Collins (0208 921 4472); Sharon Pearson (0208 921 4493) or School Safeguarding Officer Rachel Walker (0208 921 2206.)
childrens-LADO@royalgreenwich.gov.uk

14.11 If the allegation meets any of the four criteria set out in section 14.2 then the Head Teacher shall contact the LADO (Education) without delay, and provide the LADO with written confirmation of the allegation.

14.12 The Head Teacher shall, as soon as possible, following briefing from the LADO inform the subject of the allegation.

14.13 If there is an allegation or concerns raised against the Head Teacher, then the Chair of Management Committee will be contacted. The Chair of Governors for this school is:

Yvonne Geddis: ygeddis@btinternet.com

14.11 In the event of allegations or concerns against the Head Teacher the Chair of the Management Committee (or the Vice Chair) will contact the LADO, whose contact details are given in 14.10 above.

15 Allegations concerning other children

15.1 This policy recognises that children are capable of abusing their peers. Staff are aware that any allegations will be investigated appropriately when they report concerns to the DSL and will never be tolerated or passed off as “banter” or “part of growing up”. Any form of inappropriate touching or evidence of initiation procedures, sexting and upskirting (or other inappropriate use of new technology) will be followed up robustly.

15.2 Staff should follow the procedures (section 9 and 10) above for any disclosures of peer on peer abuse or any concerns that this might be happening.

15.3 Victims of peer on peer abuse will be supported as for any other form of abuse in their best interests.

15.4 Peer on peer abuse can manifest itself in many ways. The curriculum provides opportunity for the school to help children safeguard themselves from sexual violence, new technology and through learning about personal safety. (ref. Teaching Safety Online in School (2019) and opportunities to teach safeguarding reflect the new requirements covered by the publication, ‘Relationships Education, Relationships and Sex Education (RSE) and Health Education Statutory guidance for governing bodies 2020)

16 Monitoring & Evaluation

16.1 The responsibility for ensuring that the Child Protection Policy and procedures are in place, available to parents and reviewed annually lies with the Management Committee. This policy will be reviewed in line with the timescale and details set out on the front cover.

17.1 List of related policies/procedures

- Anti-bullying policy
- Child Protection
- Medical Needs
- E-safety policy
- ICT policy
- Acceptable use agreements
- Behaviour policy
- Equalities policy
- Home Visit Policy
- Asthma
- Whistleblowing
- Safer Recruitment in schools
- Induction policy
- Drugs in school
- Staff Code of Conduct (staff behaviour policy)

CSE

Photography policy

Female Genital Mutilation (FGM)

Forced Marriage

Intimate care policy

Positive handling/ Physical restraint

Sex and Relationships Education Policy (SRE)

Attendance

Health and Safety

Curriculum policy

APPENDIX 1: Types and Indicators of Abuse (to be read in conjunction with Keeping Children Safe in Education Part 1)

NB. This guidance is provided as a useful reminder of the types and indicators of abuse but should always be considered within the context of a comprehensive training programme and not as a substitute for more in depth consideration

There are four categories of abuse, which may result in a child being placed on the Child Protection Register. They are:

- ☐ Physical Abuse
- ☐ Emotional Abuse
- ☐ Sexual Abuse
- ☐ Neglect

Definitions of child abuse

'Child Abuse and neglect' is a generic term encompassing all ill treatment of children including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child's health or development. Children may be abused or neglected through the infliction of harm or through the failure to act to prevent harm. Abuse can occur in a family, an institutional or community setting. The perpetrator may be known

or not known to the child. There are 4 broad categories of abuse which are used for the purposes of registration. These categories overlap and an abused child may suffer more than one type of abuse.

1. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child. It may also be caused when a parent or carer feigns the symptoms or deliberately causes ill health to a child (now described as 'fabricated or induced illness').

Possible indicators of Physical Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Unexplained injuries including burns, particularly if they are recurrent
- Improbably excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered, even in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Running away

2. Emotional Abuse

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. 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.
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

- 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.
- seeing or hearing the ill-treatment of another (including witnessing domestic violence)
- serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Possible indicators of Emotional Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Physical and/or mental and/or emotional development lags
- Admission of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour e.g. thumb sucking, hair twisting, rocking
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing or scavenging

3. Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing 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 (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.

Possible indicators of Sexual Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Sudden changes in behaviour or in school performance
- Displays of affection in a sexual way, inappropriate to age
- Tendency to cling or need reassurance
- Regression to younger behaviour e.g. thumb sucking, acting like a baby, playing with discarded toys
- Complaints of genital itching or pain, or anal pain
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Apparent secrecy
- Bedwetting, daytime wetting and/or soiling
- Sleep disturbances, nightmares
- Chronic illness, e.g. throat infection, venereal disease or other STD * Anorexia, bulimia
- Unexplained pregnancy

- Fear of undressing, e.g. for sport
- Phobias or panic attacks

4. Neglect

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

Possible indicators of Neglect - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging

Additional safeguarding issues

Honour Based Violence

So-called 'honour-based' violence (HBV) 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. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

- **FGM mandatory reporting duty**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases.

Mandatory reporting of female genital mutilation procedural information can be found at:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

- **Possible indicators of Female genital mutilation (FGM)**

- Holiday requests made to school for significant lengths of time (Pre warning)
- Long periods of time away from the classroom during the day with bladder or menstrual problems
- Avoidance of P.E.
- Difficulty walking, sitting or standing
- Prolonged absences from school
- Noticeable behaviour changes
- Withdrawal
- Depression
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain

- **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 and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fm@fco.gov.uk. See also Royal Borough of Greenwich Safeguarding Children Partnership website:

www.greenwichsafeguardingchildren.org.uk

Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for

money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. The manipulation or '**grooming**' process involves befriending children, gaining their trust, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited.

- **Possible indicators of CSE Child Sexual Exploitation (CSE)**
- Inappropriate sexual or sexualised behaviour
- Repeat sexually transmitted infections
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- Going to hotels or other unusual locations to meet friends
- Getting in/out of different cars driven by unknown adults
- Going missing from home or care
- Having older boyfriends or girlfriends
- Associating with other young people involved in sexual exploitation
- Truancy, exclusion, disengagement with school, opting out of education
- altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- Drug or alcohol misuse
- Getting involved in crime
- Injuries from physical assault, positive handling (physical restraint), sexual assault

Children missing from Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. The law requires all schools to have an admission register and with the exception of schools where pupils are boarders, an attendance register. All pupils must be placed on both registers. Staff should be aware of their school or college's unauthorised absence and children missing from education procedures

- **Children are considered to be missing education if they:**
- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer is unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she know his/her parent/carer has indicated the intention to continue to attend the school after ceasing to be of compulsory school age:
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

The school must inform the local authority of any pupil 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 (or in default of such agreement, at intervals determined by the Secretary of State).

Private fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a **private arrangement made between a parent and a carer**, for 28 days or more. Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity). To help keep children safe and support families, all parents and private foster carers must **notify MASH** of care arrangements for children so they can ensure a child is well cared for. If a member of school staff suspects a child may be being privately fostered without formal arrangement it is important you share this information in case a child is at risk of harm.

Extremist ideology, radicalisation and terrorism

Children and young people can suffer harm when exposed to an extremist ideology which may be social, political or religious in presentation. This harm can range from a child adopting or complying with extreme views which limits their social interaction and full engagement with their education, to children being groomed for involvement in violent actions.

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

Child Criminal exploitation: county lines

Criminal exploitation of children 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 periods of absence from school, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism 98 should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Peer-on-peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

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 exploitation or radicalisation and act appropriately.

Information regarding the definition and signs of further safeguarding issues including homelessness, domestic abuse, children with family members in prison and children and the court system etc can be found in Annex A of Keeping Children Safe in Education 2019.

Behaviours: age 13 to 17 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- asking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

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Brook Sexual Behaviours Traffic Light Tool adapted with permission from True Relationships & Reproductive Health. (2012). Traffic Lights guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia.

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Appendix 2: safer recruitment and DBS checks – policy and procedures

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

New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

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

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

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

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

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

Trainee/student teachers

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

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have the following checks:

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

Staff working in alternative provision settings

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

Adults who supervise pupils on work experience

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

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

Appendix 3: allegations of abuse made against staff

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

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

Suspension of the accused until the case is resolved

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority if deemed appropriate

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of the Management Committee) where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by

whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. (An individual may seek further support from their trade union representatives, a colleague, or welfare counsellor)
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

Where the police are involved, wherever possible the Management Committee/ Head Teacher will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply staff

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

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation

- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

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

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

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

Record-keeping

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

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

This will include consideration of (as applicable):

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

Contact parents as soon as a child is identified as missing

Contact appropriate external services (including MASH)

Liaise with both parents and services throughout the missing period to return the child to an appropriate safe place.