



## **Stantonbury School**

# **Safeguarding and Child Protection Policy**

**Academic Year: September 2021-22**

**Last reviewed on: September 2021**

**Next review due by: September 2022**

**Policy lead: Katie Shires, Designated Safeguarding Lead**

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# 1 Stantonbury School Safeguarding Team

<b>Designated Safeguarding Lead:</b>	Katie Shires, Vice Principal
<b>Designated Safeguarding Officer One:</b>	Gareth Massey, Assistant Principal
<b>Designated Safeguarding Officer Two:</b>	Rebecca Gowers, Assistant Principal
<b>Senior Child Protection Officer:</b>	Marion Randall

## Year Group Child Protection Officers

<b>Year 7:</b>	Fiona Farley
<b>Year 8:</b>	Emily Alexander
<b>Year 9:</b>	Jane Bullivant
<b>Year 10:</b>	Tegen Rule
<b>Year 11:</b>	Nicola Iacono
<b>Sixth Form:</b>	Claire Maxwell Carol Leckie

**Designated Safeguarding Governor:** Thomas Schilling

## Contacts

- 1) Phone reception 01908 823400 ask for your Year groups Child Protection Officer. Please leave a phone number and a time to call if they are not available immediately
- 2) Safeguarding email: [dslteam@stanonbury.org.uk](mailto:dslteam@stanonbury.org.uk)
- 3) Milton Keynes Multi agency team – MASH 01908 253169
- 4) Milton Keynes Multi Agency team – MASH Out of Hours 01908 265545

Our school website lists a number of specific support agencies

In a safeguarding emergency where a young person is at immediate risk of harm, call 999

## 2 Introduction

### Safeguarding Statement of Intent

'Safeguarding is everybody's responsibility'

Stantonbury School has a duty of care to safeguard and promote the welfare of all children, regardless of age, ability or disability, gender, race, religion or belief, sexual orientation, or socio-economic background.

Stantonbury School is committed to ensuring that all our children and young people are safe and feel safe:

- that children, parents/carers and staff can talk about any safeguarding concerns and feel assured that they will be listened to.
- that all staff and volunteers are aware of and know how to implement safeguarding procedures and guidance, including what to do if they suspect a child or young person may be experiencing, or be at risk of, harm.

Safeguarding is the day-to-day safety at all levels – from the low level (e.g., walking sensibly around the school site) to the very high level (something which needs Child Protection intervention).

Child Protection (CP) is at the high end of safeguarding. Stantonbury School recognises its responsibility to respond appropriately to this concern.

Evidence shows that happy, healthy, and safe children participate more fully in lessons and therefore learn more effectively.

This policy applies to all staff, governors and volunteers working within the School. The policy includes all the principles and guidance within 'Keeping Children Safe in Education' September 2021.

## 3 Legislation and Guidance

This policy is reviewed on an annual basis. In September safeguarding updates are made to ensure that staff awareness remains high, and that information remains informative, relevant, accessible and highlights any areas requiring further development.

It reflects the school's statutory responsibilities and takes account of national guidance and local procedures as follows:

- This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners: Milton Keynes Council, NHS Milton Keynes Clinical Commissioning Group and the Milton Keynes District of Thames Valley Police.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

- [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

This policy also complies with our funding agreement and articles of association.

Our policies and procedures are consistent with Milton Keynes Safeguarding Children Board (MKSCB), now part of MK Together combining both adult and children's safeguarding, procedures and that these are regularly monitored, reviewed, and updated where necessary.

## 4 Definitions

### **Safeguarding and promoting the welfare of children is:**

- a) protecting children from maltreatment
- b) preventing the impairment of mental and/or physical health or development
- c) ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- d) taking action to enable all children to have the best outcomes.

**Child protection** is part of safeguarding and promoting welfare but refers specifically to activity that is undertaken to protect specific children who are suffering or are likely to suffer significant harm.

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

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

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**Children** includes everyone under the age of 18.

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 decide to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- Milton Keynes Council
- NHS Milton Keynes Clinical Commissioning Group
- Milton Keynes District of Thames Valley Police

Stantonbury School shares the objectives of the **Milton Keynes Safeguarding Children Partnership (MKSCP)** to help keep children and young people safe by:

- Providing a safe environment for young people to learn in education settings
- Identifying children and young people who are suffering or likely to suffer significant harm and take appropriate action with the aim of making sure they are kept safe at both home and in school.
- Preventing the employment of people unsuitable to be working with children and young people.
- Promoting safe practice and challenging poor and unsafe practice.
- Identifying instances in which there are grounds for concern about a child's welfare and initiate/take appropriate action to keep them safe.
- Promoting an effective partnership amongst all those involved with providing services for children.

The purpose of this policy is to ensure that there are clear procedures and lines of communication to support the achievement of these objectives. This document covers the procedures for dealing with suspicions or allegations of child abuse. These procedures are intended to work alongside the MKSP procedures. The School has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action.

The Children Act 1989 defines a child as a person under the age of 18 years. It is not the responsibility of the school staff to investigate suspected abuse, as this is a matter for social care, the police and/or NSPCC. The role of staff is to identify any alleged/potential abuse and to refer this to the designated member of staff who will in turn refer to the appropriate authorities, so that they can investigate and act.

The school recognises that in the day-to-day nature of contact with students, staff are well placed to observe the outward signs of abuse. The school will:

- Create an atmosphere where students feel secure, are listened to and valued.
- Ensure students know they have a range of adults whom they can approach for help and know how to ask for help.
- Include opportunities in the Personal, Social and Health Education curriculum, for students to develop the skills they need to recognise and stay safe from all forms of abuse.

## **5 Roles & Responsibilities**

Staff who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE). All staff will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

### **All staff**

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

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

### **Senior Child Protection Officer**

in addition to the above:

- To support all members of the safeguarding team on a day-to-day basis
- To support the DSL in administrative duties
- To keep an up-to-date log of all referrals and Child Protection concerns using the CPOMS (Child Protection Online Management System).
- In liaison with the DSL, oversee the transfer of all safeguarding files at normal school transfer and within year admissions as well as those leaving Stantonbury School. This will be completed by secure mail or through electronic transfer if other schools are also using CPOMS.
- To attend external meetings where appropriate

### **Designated Safeguarding Lead**

- To support and advise a member of the safeguarding team in undertaking his/her role
- To act as the Child Protection and safeguarding representative on Leadership Team
- To respond to any allegations made against a member of staff (Low-level thresholds)
- To provide the Associate Principal with a termly report detailing any changes to the policy and procedures; training undertaken by safeguarding team and other staff; relevant curriculum issues; number and type of incidents/cases and number of children referred to social care.
- To undertake an annual audit of safeguarding.
- To maintain a record of all staff receiving Child Protection training and to liaise with HR to ensure that all new staff are adequately trained in this area as soon as they take up post
- To ensure all volunteers working within the school are adequately trained
- To ensure that when a child leaves Stantonbury school their Child Protection file is copied for the new establishment as soon as possible, but transferred separately from the main student file for the attention of their Designated Safeguarding Lead
- To meet termly with the safeguarding team to deliver training
- To attend statutory Child Protection inter-agency training to keep up to date with knowledge to enable them to fulfil his/her role

- To complete documentation and ensure that this information is kept current and correct
- To inform the relevant agency if a referral is deemed necessary. A written record of the date and time of the report should be made.
- Help promote educational outcomes by sharing via CPOMS the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers tutors and the leadership team.
- The DSL should understand the processes, procedures and responsibilities of other agencies, particularly Children's Social Care, and there is an expectation that the DSL will keep their training up to date.
- The DSL and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

### **Associate Principal**

- To ensure that parents have access to the Safeguarding and Child Protection Policy via the Stantonbury School Website
- To appoint a designated person to coordinate safeguarding action within the school and liaise with other agencies on suspected abuse
- To ensure there is a designated person from the AIB for Child Protection
- To liaise with the nominated DSL and AIB representative for Child Protection issues on the school SG policy
- To understand the roles of a member of the safeguarding team and DSL
- To respond to any allegations made against a member of staff following guidelines
- To ensure that all staff know and are alert to signs of possible abuse and know what to do if they have concerns or suspicions
- To ensure that all staff have induction training covering Child Protection and safeguarding and that they are made aware of Stantonbury School's Safeguarding and Child Protection Policy in line with guidelines as well as Keeping Children Safe in Education September 2021.

Work with local partners such as Local Authority and Social Services to create a safe environment for the children at the school.

### **The Academy Improvement Board (AIB)**

The AIB will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation
- Appoint a safeguarding member to monitor the effectiveness of this policy in conjunction with the full governing board.

The chair of the AIB will act as the 'case manager' if an allegation of abuse is made against the headteacher, where appropriate.

## **6 Guidelines & Advice on how to deal with a disclosure**

A flowchart outlining the general decision-making approach can be found in Appendix 5

All staff have the responsibility to provide a safe environment in which children can learn. They must:

- be vigilant, 'think the unthinkable' and accept that child abuse can happen anywhere, including in schools, maintaining the attitude of 'it could happen here'
- Treat abuse seriously, including peer-on-peer abuse, have 'zero tolerance' to abuse or never pass it off as 'banter', 'just having a laugh' or 'part of growing up'
- Understand that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can involve children who are not the school's students. Staff must, particularly the safeguarding team, consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including sexual exploitation, criminal exploitation and serious violence. This is known as contextual safeguarding.
- All disclosures and concerns must be reported to the year groups Child protection officer (CPO) and senior protection officer via CPOMs. This must be done as soon as possible
- In the absence of the year group CPO all concerns should be reported to a DSO or DSL. In their absence, any member of the Leadership Team.
- If, for any reason, none of the above staff are available the individual staff member must maintain personal responsibility and ensure that concerns are referred to the appropriate services (MASH)
- If the young person is at immediate risk or at risk when leaving school, the disclosure must be reported immediately to the Year group CPO or DSL. Either in person or via reception who will find and contact the Year group CPO or DSL.
- All disclosures / concerns are to remain confidential between the member of staff and who they report to. The member of the safeguarding team will seek advice if needed.

### **6.1 When a young person makes an allegation of abuse the member of staff who receives it must:**

- Make it clear to students that complete confidentiality cannot be made. Do not promise to keep it a secret. Inform the student that this information will need to be passed on to the safeguarding team
- Not conduct a formal interview.
- Listen, remain calm and be reassuring and supportive
- Ensure questions are kept to the minimum to understand what is being alleged. Leading questions should be avoided as these can cause problems for subsequent investigation and any court proceedings. Record the young person's account, as close to verbatim as possible.
- Write an account of the disclosure as soon as possible and record this on CPOMs. The written account should be fact based only and needs to be signed by the member of staff who received the allegation

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

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

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

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

**Any teacher** who either:

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

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

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

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

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out 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.

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

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

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

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

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

### **6.4 Dealing with allegations against a member of staff (Including all volunteers, governors, and supply staff)**

We recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about

the conduct of adults in the school should be taken to the Associate principal without delay; any concerns about the Associate Principal should be reported to the Executive Principal. Concerns about the Executive Principal should be reported to the Chair of the AIB.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Associate Principal has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO). The low-level concern may mean the member of staff may have acted in a way that is:

- inconsistent with the staff code of conduct, including conduct outside work
- another allegation that does not meet the threshold e.g., over friendly with children, having favourites, taking photographs on a non-school device, offensive or intimidating language

The review of the concern might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that policies or processes could be revised, or extra training delivered to minimise the risk of it happening again.

It is an allegation if the person has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

In such a situation the LADO will always be informed. The full procedure is described in Appendix 3

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

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

We also recognise the gendered nature of 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, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

### **Procedures for dealing with allegations of peer-on-peer abuse**

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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils can easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
  - That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns

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

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

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

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

### **Initial review meeting**

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

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

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

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the

police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

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

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

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

### **Informing parents/carers**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through the school Police Liaison Officer.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

### **Curriculum coverage**

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

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

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

## **6.8 Children with special educational needs or disabilities**

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges which can be an additional barrier to recognising abuse and neglect in this group of children.

These can include

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.

- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges.

When responding to a safeguarding concern involving children with SEND staff should be aware of such barriers and take additional steps to ensure they are well supported.

## **7 Training**

All staff who work with young people need to ensure that they understand safeguarding and child protection issues. Through the delivery of regular training all staff will be able to recognise the signs and symptoms of abuse, know what to do when dealing with a safeguarding or child protection issue and be aware of the current safeguarding trends and themes, including changes in law, procedures, and policy. It is the responsibility of all staff requiring training to highlight their need to their Line Manager. Stantonbury School has a responsibility to assist the staff member in accessing appropriate training.

### **7.1 Ongoing refresher training**

Teachers receive education in Safeguarding and CP as part of training leading to Qualified Teacher status however this needs to be reinforced by further refresher training. Support Staff will be offered training as appropriate to their role within the School. All members of staff will receive annual update training, usually during School INSET days and through regular updates in staff meetings, briefings. Online training may be used as required. All staff will familiarise themselves with this Safeguarding and Child Protection Policy each year when it is reviewed and updated. All staff are required to read and have understood Part 1- Keeping Children Safe in Education that is published each September.

### **7.2 New staff**

All staff, when joining the school, will complete the online courses listed below and receive a follow up meeting with the DSL during their induction:

- Safeguarding Young People
- Child Protection Refresher 2021
- PREVENT
- FGM
- Online Safety

### **7.3 Safeguarding team training**

All members of the designated safeguarding team and the Senior Leadership team will undertake Designated Safeguarding Level 3 training every two years. The safeguarding team will receive training in inter-agency procedures that enables them to work in partnership with other agencies and gives them the knowledge and skills needed to fulfil their responsibilities. They will undertake refresher training at two yearly intervals to keep their knowledge and skills up to date. The Designated Safeguarding Lead will attend advanced designated lead training as appropriate

#### **7.4 AIB members**

Members of the AIB will also complete safeguarding training suitable for governors annually and are required to have read and understood this policy and the current version of Keeping Children Safe in Education.

#### **7.5 External agency staff**

Staff from external agencies will adhere to the training guidance as recommended by their professional body. Please refer to these agencies' own CP guidelines for further clarification.

#### **7.6 Students**

It is important to make children and young people aware of behaviour towards them that is not acceptable and how they can keep themselves safe. Personal Social and Health Education, provides opportunities for students to learn about keeping safe and who to ask for help if their safety is threatened. Students receive a wide variety of presentations via assemblies and through tutor time on a range of aspects of safeguarding topics. Every building displays the Schools safeguarding team and helpful information such as: national children's helplines (Child Line, NSPCC) and other external support schemes for children and young people.

#### **7.7 Support & Supervision**

Working with Safeguarding entails making difficult and risky professional judgments. It is demanding work and can be stressful and distressing. All those involved should have access and support from peers, managers, named and designated professionals, occupational health etc. Line managers have a responsibility to recognise workload and personal stresses, in order to ensure that dangerous professional practice leading to a child being unprotected is not taking place. The consequences of such stresses need to be openly acknowledged and an agreement reached as to how they can be reduced to a manageable level.

Management supervision should include scrutinising and evaluating work carried out, assessing strengths and areas for development for the practitioner. Supervision should also provide pastoral support and be available as an important source of advice.

### **8 Supported Work Experience Placements, Off Site Education and Off-Site Workers for Work Placements**

- If a student is going to work off site, for example for a Work Experience placement, or for any other work-related learning, they will be dealing with adults as colleagues, in a work setting. They might even be dealing with the general public, for example in a retail placement. It is the duty of the school to ensure that the student is safe in such a setting
- The school will ensure that a risk assessment has taken place before the placement commences. A third party, such as an Education Business Partnership (EBP) like Develop can undertake these risk assessments on behalf of the school.
- The school will most usually broker such placements through a reputable EBP such as Develop. If this is not possible a link teacher from Stantonbury school will be nominated who will take responsibility for the risk assessment being carried out and being robustly monitored
- However, the placement is brokered, a link member of staff will be nominated from Stantonbury school

- If the placement is unsuitable following the risk assessment, the school will not allow the placement to go ahead
- If the risk assessment is satisfactory then the placement can commence. A link adult will monitor the placement on behalf of Stantonbury School
- Offsite workers, such as those who line manage or mentor the student working off site, will be asked to have a voluntary Vetting and Barring Service check but we cannot make this compulsory. However, if the Stantonbury school link adult feels that there is any risk, the placement will be terminated
- In a work setting a student might be working with many adult colleagues or with members of the public, so it is not feasible for all to have a Vetting and Barring Service check; however, if the Stantonbury school link adult feels that the student's safety is being put at risk in any way, the placement will be terminated
- Regular contact will be maintained with the student who is on a work-related placement, via emails, telephone calls, visits to the workplace and written feedback.
- Parents will be kept apprised of the progress of the placement.

## **9 Records and Monitoring**

Well-kept records are essential to good Safeguarding practice. The school has a responsibility to record any concerns about a student. These records are confidential and should be kept in a secure place, which should be separate from the rest of the student file.

We use an online Child Protection Online Management System (CPOMS) to record all CP and safeguarding concerns. This enables us to manage appropriate access to confidential information that is stored securely. (GDPR compliant)

All CP files should be stored in a locked cabinet in the Senior CPO's office and comply with Data Protection procedures (including updated GDPR compliance).

## **10 Children missing in education**

All parents are requested to provide at least two emergency contact numbers for their child. The school will maintain the admissions register and attendance registers in line with statutory requirements. Parents will be informed of any absence of their child on the day and follow up welfare calls will be made by the pastoral team. The school will inform the local authority before it removes a child from the admission register for whatever reason. The school will inform the local authority of any student who fails to attend school regularly or has been absent without school's permission for a period of 10 consecutive days or more.

## **11 Safer recruitment**

The school operates a safer recruitment policy to ensure all staff employed by the school are suitable for the posts they are employed for and all volunteers are suitable to work with children.

The school maintains a single central register of its staff and volunteers in line with statutory guidance

The SCR will be monitored to ensure that it is accurate and up to date:

- DSL will have access to undertake spot checks to ensure the appropriate processes are being followed, or to verify information that may be connected to a safeguarding concern
- Annual review will take place by the Safeguarding Governor.

Full details are outlined in appendix 2.

## 12 Links to other policies

**Safeguarding policy is also part of other school policies:**

- Staff code of conduct
- Anti-bullying policy
- behaviour & attitudes to learning policy
- Safer recruitment policy
- On-line safety policy
- Whistle blowing policy

## 13 Key contacts

If you are unable to find a member of the Safeguarding Team and you feel there is a risk of a student being harmed, then please phone the **MASH** and seek advice or telephone the **Police on 999**. **Do not** wait until the next day.

<p><b>To make a referral or consult regarding concerns about a child</b></p>	<p><b>Milton Keynes Council Multi-Agency Safeguarding Hub (MASH)</b> Telephone: <b>01908 253169</b> or <b>253170</b> during office hours <b>OR</b> <b>Emergency Social Work Team</b> Telephone: <b>01908 265545</b> out of office hours Email: <a href="mailto:children@milton-keynes.gov.uk">children@milton-keynes.gov.uk</a></p>
<p><b>For allegations about people who work with children</b></p>	<p>Contact MILTON KEYNES COUNCIL MASH as above or Jo Clifford, <b>Local Authority Designated Office (LADO)</b> Telephone: <b>01908 254306</b> Email: <a href="mailto:jado@milton-keynes.gov.uk">jado@milton-keynes.gov.uk</a></p>
<p><b>For information about safeguarding training for academies and education settings.</b></p>	<p>Leadership and Governance Services Telephone: <b>01908 253787</b></p>
<p><b>For general queries regarding safeguarding</b></p>	<p>MKC Children &amp; Families Head of Safeguarding: Telephone: <b>01908 254307</b> Email: <a href="mailto:jo.hooper@milton-keynes.gov.uk">jo.hooper@milton-keynes.gov.uk</a></p>
<p><b>Milton Keynes Safeguarding Partnership</b> Detailed information and guidance about safeguarding children and inter-agency training opportunities</p>	<p><a href="http://www.mkscb.org/policy-procedures/">http://www.mkscb.org/policy-procedures/</a></p>

## **Appendix 1**

### **Types of Abuse & Neglect**

All those who encounter children and young people need to be aware of signs which may indicate abuse or neglect. The following does not provide an exhaustive list of possible indicators, nor do these indicators necessarily mean that a child has been abused. These factors are to be used as guidance only for staff which would indicate that the child may be at risk and that early help interventions are put in place.

Further detail can be found in: *Keeping Children Safe in Education 2021*

- Abuse – includes domestic, faith and relationship
- Bullying
- Children and the courts
- Children missing in education
- Children with family members in prison
- Child exploitation – county lines, child sexual exploitation, trafficking
- Drugs
- Honour-based abuse – FGM, forced marriage
- Health and well-being – fabricated illness, medical conditions, mental health
- Homelessness
- Online – sexting
- Private fostering
- Radicalisation – Prevent
- Violence – gangs, women and girls, sexual

#### **Vulnerable Children**

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

#### **Abuse: (PENS)**

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

#### **Physical Abuse**

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

#### **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on a child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only for meeting the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may involve age or developmentally inappropriate expectations being imposed on children. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children to feel frightened or in danger or the exploitation or corruption of children.

#### **Neglect**

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health and development. Neglect may occur

during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter; protect a child from physical and emotional harm or danger; ensure adequate supervision or ensure access to appropriate medical care or treatment. It may also include neglect of a child's basic emotional needs.

### **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, whether 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 the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming in preparation for abuse (including via the internet).

### **Child sexual exploitation (CSE) and Child criminal exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual takes an advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Power imbalance examples include – age, gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic or complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when the activity appears consensual. Exploitation can be facilitated and/or take place online.

County lines, where drugs moved around by victims of CCE, frequently involve children and vulnerable adults who have been trafficked. In such cases the DSL will need to involve the police.

### **Peer on peer abuse**

The AIB will ensure that the school has processes, procedures and systems to minimise the risk of peer-on-peer abuse and to deal with it in a timely way when it does happen. All staff should be aware that children can abuse other children and treat any concerns about peer-on-peer abuse in the same way as that involving adults. There is an awareness that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported. It is more likely that girls will be victims and boys' perpetrators, but that all peer-on-peer abuse is unacceptable and will be taken seriously.

Peer on peer abuse is most likely to include:

- Bullying
- Abuse in intimate personal relationships
- Physical abuse
- Sexual violence (including online elements that threaten)
- Sexual harassment
- Forcing someone to engage in sexual activity without consent
- Consensual or non-consensual sharing of nudes and semi-nude images/videos
- Up skirting
- Initiation type violence or rituals

In all cases of alleged child-on-child sexual violence and harassment, staff and the safeguarding team will challenge inappropriate behaviours. No behaviours however small will be downplayed as this can lead to a culture of unacceptable behaviour and worst cases normalises abuse.

Victims will always be reassured that they are being taken seriously, that they will be supported and kept safe.

- Where a report of sexual violence has been made, the DSL will make an immediate risk assessment. This will take account of protection and support for the victim, management of the alleged perpetrator and consideration for other children and staff. The DSL will liaise with local authority specialist services and the police as required. KCSIE 2021 Part 5 and the separate guidance 'Sexual violence and sexual harassment between children in schools and colleges' sets out how schools and colleges should respond to reports of sexual violence and sexual harassment. In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020)

All staff have received training as to the school's policy and procedures with regards to peer-on-peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

- Staff and students are aware of the systems in place to confidently report abuse, knowing their concerns will be treated seriously
- All allegations of peer-on-peer abuse will be recorded, investigated, and dealt with in a timely manner
- The safeguarding team will arrange how victims, perpetrators and any other children affected by peer-on-peer abuse will be supported.

### **Domestic abuse**

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time. The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse
- (b) violent or threatening behaviour
- (c) controlling or coercive behaviour
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services)
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives, the definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in their home lives, and this can have serious, long lasting emotional and psychological impact. The school is informed of local cases through operation encompass. Any students reported are added to the school's safeguarding records and supported appropriately in school.

### **Serious violence**

All staff should be aware of indicators which signal that children are at risk from or are involved with serious violent crime. Indicators include increased absence from school, changes in friendships, a decline in performance, significant changes to well-being and unexplained injuries, gifts or possessions. Staff should seek advice from the DSL if they are concerned.

### **Radicalisation and extremism**

All staff undertake PREVENT training. Any concerns that a child might be vulnerable to radicalisation are referred to Channel when appropriate. The school will work closely with parents, unless it has specific reason to think that this would put the child at risk, to identify early signs of radicalisation, keeping them informed about any concerns in school and guiding them towards the right support mechanisms.

Through the school's online safety policy, the school will have in place measures to prevent children from accessing terrorist and extremist material on the internet.

### **Mental Health**

Staff should be aware that mental health problems can in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation.

Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Staff who observe or identify behaviours suggesting a child is experiencing a mental health problem or at risk of developing one will refer the child to the safeguarding team.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK) using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Staff should seek advice from the DSL if they are concerned.

### **FGM**

All staff undertake specific FGM training.

If a member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they will report this directly to the police or speak to the DSL immediately who will report it to the police.

## **Appendix 2**

### Safer Recruitment and DBS checks

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

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

### **Advertising**

When advertising roles, we will make clear:

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

### **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

### **Shortlisting**

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

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they can share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

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

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

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees

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

### **Interview and selection**

When interviewing candidates, we will:

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

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

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

### **New staff**

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

**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**

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

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

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

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

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

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

### **Contractors**

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

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

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

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

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

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

### **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

### **AIB Members**

All AIB members 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.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

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

### **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.

### **Pupils staying with host families**

Where the school decides for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## **Appendix 3**

### **Allegations of abuse made against staff**

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

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

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

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of the AIB where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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

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

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

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

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

#### **Definitions for outcomes of allegation investigations**

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree, and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** regarding the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents

or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

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

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

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

### **Timescales**

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

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

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

### **Specific actions**

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

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

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

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

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

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

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

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

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

If a report is:

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

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

If an allegation is:

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

### **Confidentiality and information sharing**

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

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

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

## Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file). For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

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

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

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

## References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated, or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

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

This will include consideration of (as applicable):

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

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

## Non-recent allegations

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

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

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

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

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent, or other adult within or outside the school
- Pre-employment vetting checks

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

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

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating, or offensive language

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

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

We will create this culture by:

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

### **Responding to low-level concerns**

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct

### **Record keeping**

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

Records will be:

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

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

### **References**

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

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

## **Appendix 4 – specific safeguarding concerns**

### **Children missing from education (CME)**

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

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

Indicators of CCE can include a child:

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

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

### **Child sexual exploitation**

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

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

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

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

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

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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

### **Domestic abuse**

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Older children may also experience domestic abuse and/or violence in their own personal relationships. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

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

The DSL will provide support according to the child's needs and update records about their circumstances.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

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

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

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

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

### **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. This policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

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

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

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

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

### **Preventing radicalisation**

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 that they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

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

Staff should **always** act if they are worried.

### **Peer-on-peer abuse**

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

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

Sexual violence and sexual harassment can occur:

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

Sexual violence and sexual harassment exist on a continuum and may overlap. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

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

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

Staff should be aware of the importance of:

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

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

## **Serious violence**

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

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

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

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

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

## **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 appropriate level of DBS check has been carried out

All other visitors, including visiting speakers, will be always accompanied by a member of staff. 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.

## Appendix 5

### FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD

