



Manor Hill

Safeguarding and Child Protection Policy

Date: 26 October 2019

Review date: October 2020

Designated Safeguarding Lead:
Mr Michael Ellinas

Head Teacher:
Mr Michael Ellinas

Designated Safeguarding Governor:
.....

Deputy Safeguarding Leads:
Ms Anna Schoina

1. INTRODUCTION

Purpose of a Safeguarding and Child Protection Policy:

- To inform staff, parents and careers, volunteers and Governors about the school's responsibilities for safeguarding children.
- To enable everyone to have a clear understanding of how these responsibilities should be carried out.

Safeguarding and promoting the welfare of children is everyone's responsibility.

School Staff and Volunteers

All school staff and volunteers are particularly well placed to observe outward signs of neglect, abuse, changes in behaviour and failure to develop, because they are in contact with children.

They should be aware of the important role the school has in the early recognition of the signs and symptoms of physical, emotional, sexual abuse or neglect, and the appropriate referral process within Manor Hill School.

The school will require *all adults employed on the premises* to have the appropriate clearance to work with children and will ensure that enhanced checks are obtained from the Disclosure and Barring Service ("DBS").

All volunteers involved in a regulated activity within school or off school premises will also have been cleared to work with children following a DBS check. If a volunteer's activity is supervised by an employee or the Governing Committee of the school in a regulated activity so that the volunteer's activity is not regulated, then such supervision will be regular and reasonable in the circumstances so as to ensure the children's safety.

Regular updated checks will be required by the Governing Committee, as determined by the Governing Committee's staffing review process.

Safer recruitment is practiced at all times as part of our safeguarding policy. See ****APPENDIX I****.

The Governing Committee

The whole Governing Committee will also comply with vetting and a named governor will participate in the school's training with regard to Child Protection procedures. The Governing Committee will monitor the implementation of this policy and review it annually.

The School's Aims

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to when they have a worry or concern.

- Ensure children know that there are adults in the school whom they can approach if they are worried.
- Ensure that children belonging to minority groups such as LGBTQ are supported.

2. STATUTORY FRAMEWORK

The Safeguarding Vulnerable Groups Act 2006, amended by the Protection of Freedoms Act 2012 introduced a new vetting and barring scheme for all those working with children and young people from 2012.

Legislation

Children Act 1989

Children Act 2004

Safeguarding Vulnerable Groups Act 2006

The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)

Sexual Offences Act 2003

The General Data Protection Regulation (GDPR)

Data Protection Act 2018

[Schools providing education to pupils under the age of eight only] The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018

Voyeurism (Offences) Act 2019

Statutory guidance

HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'

DfE (2018) 'Working Together to Safeguard Children'

DfE (2015) 'The Prevent duty'

[Updated] DfE (2019) 'Keeping children safe in education'

DfE (2018) 'Disqualification under the Childcare Act 2006'

Non-statutory guidance

DfE (2015) 'What to do if you're worried a child is being abused'

DfE (2018) 'Information sharing'

DfE (2017) 'Child sexual exploitation'

DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'

Other relevant school policies include:

Child Sexual Exploitation (CSE) Policy

Children Missing Education Policy
Extremism and Anti-Radicalisation Policy
Allegations of Abuse Against Staff Policy
Behavioural Policy
Staff Code of Conduct
Data Protection Policy
Whistleblowing Policy
Anti-Bullying Policy
Exclusion Policy
E-Safety Policy
Guest Speaker Policy

The new guidance document "Safeguarding Children and Safer Recruitment in Education" and updates issued in December 2012 is a consolidated version of earlier guidance material.

It looks at the recruitment and selection processes, recruitment and vetting checks, and duties for safeguarding and promoting the welfare of children in education.

Manor Hill School has used this guidance to review and, where appropriate, modify our practice and procedures for safeguarding children, and also for dealing with allegations of abuse made against teachers and education staff.

"Keeping Children safe in Education" guidance published in April 2014 and updated in September 2019 sets out how individuals and organisations should work together to safeguard and promote the welfare of children. The new version reflects developments in legislation, policy and practice. This guidance is update annually and updates must be adhered to.

The guidance is addressed to all practitioners who have particular responsibilities for safeguarding and promoting the welfare of children.

The guidance places the following responsibilities on schools:

- Schools should be aware of and follow the procedures of the Safeguarding Partners.
- Staff should be alert to signs of abuse and know to whom they should report suspicions or concerns
- Schools should have clear procedures (of which all staff are aware) for handling suspected cases of abuse of pupils, including procedures to be followed if a member of staff is accused or suspected of abuse.
- A Designated Safeguarding Lead should have responsibility for coordinating action within the school and liaising with other agencies.
- Be alert to the potential for children and families who may benefit from 'Early Help'

- Staff with designated responsibility for Child Protection should receive appropriate training.

Safeguarding Children in Education also states that:

“Parents should be made aware of the school’s Child Protection Policy and the fact that this may require cases to be referred to the investigative agencies in the interests of the child”

3. THE DESIGNATED SAFEGUARDING LEAD

The Designated Safeguarding Lead(DSL) and Deputy Lead at Manor Hill School are:

DSL: Mr Michael Ellinas (Michael.Ellinas@ManorHill.org)

Deputy DSL: Ms Anna Schoina (Anna.Schoina@ManorHill.org)

It is the role of the Designated Safeguarding Lead for Child Protection to:

- Ensure the school operates within the legislative framework and recommended guidance.
- Ensure that all staff and volunteers are aware of the safeguarding procedures and have/ have read a copy of the government guidelines ‘What to do if you’re worried a child is being abused’.
- Ensure that the appropriate information, training and support is given to all staff.
- Ensure that the Headteacher is kept fully informed of any concerns.
- Develop effective working partnerships with other agencies and services.
- Decide with the Headteacher whether to take further action about specific concerns (e.g. refer to Children’s Services Social Care team).
- Liaise with Social Care Team over suspected cases of child abuse or neglect.
- Engage the CAF* (now called Early Help) process for families in need of or eligible for further assistance either by introducing them to the system and/or by participating within it for them. (*common assessment framework).
- Ensure accurate records relating to individual children are kept separate from academic files in a secure place and marked ‘strictly confidential’.
- Submit reports to, and ensure the school’s attendance at, Child Protection conferences.
- Ensure that the school effectively monitors children about whom there are concerns.
- Provide guidance for parents and carers, children and staff about obtaining suitable support.
- Work with the Chair Governor with responsibility for Child Protection in order to inform the Governing Committee of the effectiveness of the school’s Policy.
- Follow the school’s procedure for, and approach to, preventing radicalisation as outlined in the Extremism and Anti-Radicalisation Policy.
- Challenge senior leaders over any safeguarding concerns, where necessary.

4. SCHOOL PROCEDURES

If any member of staff or volunteer is concerned about a child s/he must inform the DSL.

The member of staff or volunteer must record information regarding the concerns immediately on the same day. The recording must be a clear, precise, factual account of the observations, using the school's Child Protection proforma. Forms are kept in school offices. Completed forms are kept safely in locked cabinets.

The Designated Safeguarding Lead will, in consultation with the Headteacher, decide whether the concerns should be referred to The Children's Service. If it is decided to do so, this will be done with prior discussion with the parents/carers, *unless to do so would place the child at further risk of harm*.

If the concern relates to inappropriate contact via communication technologies the school will:

- *Contact the parents*
- *Advise the child how to terminate the communication and save all evidence*
- *Contact CEOP <http://www.ceop.gov.uk>*
- *Consider the involvement of Police and Social Services*

Particular attention will be paid to the attendance and development of any child about whom the school has concern, or who has been made subject of a child protection plan.

If a child who is/has been on the Child Protection Register leaves the school, the Designated Senior Person will inform the social worker responsible for the case.

5. WHEN TO BE CONCERNED

All staff and volunteers should familiarise themselves with the guidance regarding physical, emotional, sexual abuse or neglect and should be concerned about a child if s/he:

- Is being contacted by someone using communication technologies (such as social networking sites) to make inappropriate contact with them
- Has any injury not typical of the bumps and scrapes normally associated with child injuries
- Regularly has unexplained injuries
- Frequently has injuries, even when reasonable explanations are given
- Gives confused or conflicting explanations about how injuries were sustained
- Exhibits significant changes in behaviour, performance or attitude
- Indulges in sexual behaviour which is unusually explicit and /or inappropriate to his or her age
- Discloses an experience in which he/she may have been significantly harmed
- Is unusually attention seeking or hyperactive
- Has poor attention
- Appears to be frightened of parents or family members
- Exhibits an abnormal attachment with their parent

- Attaches themselves indiscriminately to adults
- Is hyper alert
- Exhibits reduced response
- Has nightmares
- Is anxious/irritable
- Has abdominal pain/headaches
- Has poor self esteem
- Acts in an inappropriate way for their age
- Self-harms or has an eating disorder
- Makes frequent visits to the toilet/has pain when urinating/has urinary infection
- Fails to thrive
- Has poor hygiene
- Frequently has skin infections/head lice
- Has untreated health and dental issues
- Frequent absence from school/repeated lateness without informing the Headteacher

6. PROCEDURE AND RESPONSIBILITIES – ANY STAFF MEMBER

The procedure route will depend upon the urgency of the situation and whether it is merely a suspicion of abuse or an actual disclosure. The emphasis is on the identification of 'early help' by **all** staff.

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:

- is disabled and has specific additional needs
- has special educational needs
- shows signs of being drawn into anti-social or criminal behaviour (including gangs or other organised crime groups)
- is a young carer
- frequent absence
- is at risk of modern slavery, trafficking or exploitation
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is privately fostered

A child missing from education

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation.

Staff will monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL.

The school will contact the parents when children fail to attend classes without notice and the Head Teacher will ask to meet the parents of any pupil who fails to attend for a continuous period of THREE school days.

Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.

Two emergency contact details will be held for each pupil where possible.

Staff will monitor pupils who do not attend the school on the agreed.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

Suspicion of abuse (if abuse is suspected but there has been no disclosure):

1. Ask casual open questions about the nature of the concern e.g. bruises, marks, change in behaviour etc. "Can you tell me about..."
2. Believe the child and reassure them that they were right to talk to you.
3. Record the facts of the conversation in writing immediately afterwards using the exact words spoken not implied. Sign and date the report (it may be required as evidence).
4. Report the suspicion to the Designated Person responsible for Child Protection or the Headteacher. The Designated Person or Headteacher will take the appropriate action.

Disclosure

If a child discloses that s/he has been abused in some way, the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said but do not apportion blame
- Allow the child to talk freely-ask only open questions e.g. "Tell me more about..." Do not press for detail, put forward your own ideas or use words that the child has not used themselves.
- Stay calm and reassuring
- Do not make promises which might be impossible to keep. Tell the child that you will have to tell someone else who will be able to help – it might be necessary to refer to the case to Children's Services
- Reassure him or her that what has happened is not his or her fault

- Stress that it was the right thing to tell
- Explain what has to be done next and who has to be told
- Make a written record (using proforma)
- Establish details of full name, Date of Birth, address and names of parents/guardians
- Pass information to the Designated Safeguarding Officer without delay

Emergency Procedures

If the designated person or Headteacher are not available, establish the facts and details as above and contact social services.

- Phone MASH, the Multi-agency Safeguarding Hub (020 8359 2000) Ask for Social Services
- Follow up in writing within 24 hours (Barnet MASH website)
- Check to see if the family are known to Social Services
- Discuss the situation and ask for advice
- A social worker may come to school to talk to the child
- Establish who will be responsible for informing the parents
- Social services will contact the police as necessary
- If action is taken, follow up the phone call with a referral form

Support and Training

Dealing with a disclosure from a child, and a Child Protection case in general is likely to be a stressful experience. The member of staff/volunteer should therefore consider seeking support for him/herself and discuss this with the Designated Safeguarding Officer and Headteacher.

- Designated staff will attend update meetings
- Child Protection and Safeguarding training will be a standing item on all staff and Full Governing Committee agendas
- Any new staff will receive Child Protection Training from a designated person within their first week at the school
- Any volunteers will receive a Safeguarding summary prior to starting at the school

Mobile phone and camera safety

Staff members will not use personal mobile phones or cameras when pupils are present unless it is an emergency, or they have permission from the Head Teacher for a specific reason.

Staff may use mobile phones on school premises outside of working hours when no pupils are present.

Staff may use mobile phones in the staffroom during breaks and non-contact time.

Mobile phones will be safely stored and in silent mode whilst pupils are present.

Staff will use their professional judgement in emergency situations.

Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when pupils are present.

Mobile devices will not be used to take images or videos of pupils or staff unless prior consent has been given.

Staff who do not adhere to this policy will face disciplinary action.

The school will adhere to its **Photography Policy** at all times.

Staff will report any concerns about another staff member's use of mobile phones to the DSL, following the procedures outlined in the Child Protection and Safeguarding Policy and the **Allegations of Abuse Against Staff Policy**.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

A "specified purpose" is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
- To humiliate, distress or alarm the victim.

"Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera.

Upskirting will not be tolerated by the school.

FURTHER CAUSES OF CONCERN, PROCEDURES AND RESPONSIBILITIES CAN BE FOUND IN **APPENDIX II**

7. CONFIDENTIALITY

Child Protection raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools.

- All staff in school, both teaching and non-teaching, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies of The Children's Service and the Police.
- If a child confides in a member of staff /volunteer and requests the information is kept secret, the member of staff/volunteer MUST tell the child sensitively that s/he has a responsibility to refer cases of alleged abuse for the child's own

sake. The child should be reassured that the information will ONLY be disclosed to people who need to know.

- Staff/volunteers who receive information about children and their families should share that information only within the appropriate professional contexts. Gossip and chat are strictly forbidden.

8. RECORD KEEPING

When a child has made a disclosure, the member of staff/volunteer should:

- Make brief notes as soon as possible after the conversation
- Not destroy the original notes in case they are needed by a court
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- Draw a diagram to indicate the position of any bruising or other injury
- Record statements and observations rather than interpretations or assumptions
- Give all records to the Designated Safeguarding Lead promptly. NO copies should be retained by the member of staff/volunteer.
- Keep all records in a locked, secure place and marked 'Strictly Confidential'.

9. ALLEGATIONS INVOLVING SCHOOL STAFF/VOLUNTEERS

If an allegation of abuse is made against a member of staff/volunteer, the person receiving the allegation must take it seriously and immediately inform the Headteacher.

If any member of staff/volunteer has reason to believe that another member of staff/volunteer may have abused a child at the school, or elsewhere, they must immediately inform the Headteacher. They should also make a record of the concerns including noting anyone else who witnessed the incident/alleged incident.

If the concerns are about the Headteacher you should inform the Chair of the Governing Committee, via email Chair@ManorHill.org

The Headteacher will not investigate the allegation itself or take written or detailed statements alone. He will discuss with the Local Authority Designated Officer (LADO) to assess whether it is necessary to refer to The Children's Service in consultation with the Chair of the Governing Committee.

If the Headteacher decides, after this consultation, that the allegation warrants further action he must immediately make the referral to Children's Services following the Child Protection procedures. The LADO must also be informed, so that the Headteacher can be supported through the process.

Under these circumstances the member of staff/volunteer against whom an allegation has been made should NOT be informed of the said allegation until further action is agreed with the LADO work Manager. It may be necessary to discuss appropriate steps to ensure other children are not at risk. The allegation will be investigated in accordance with the Local Authority's Safeguarding Children Board procedures.

If it is decided that it is not necessary to refer the case to Children's Services, the Headteacher will, in consultation with the LADO, decide whether there needs to be an internal investigation. The Headteacher will follow the LADO guidance to conduct this appropriately.

10. USE OF "REASONABLE FORCE"

The School recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with medical conditions. The School will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force as set out in the DfE 'use of reasonable force' guidelines. A summary can be found below:

Reasonable force can be used to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. In a school, force is used for two main purposes –to control pupils or to restrain them. The decision on whether or not to physically intervene is down to the professional judgment of the staff member concerned and should always depend on the individual circumstances. Schools do not require parental consent to use force on a student. All members of school staff have a legal power to use reasonable force. This power applies to any member of staff at the school. It can also apply to people whom the Headteacher has temporarily put in charge of pupils such as unpaid volunteers. In addition to the general power to use reasonable force described above, the Headteacher and authorised staff can use such force as is reasonable given the circumstances to conduct a search for the following 'prohibited items':

Knives and weapons, alcohol, Illegal drugs, stolen items, tobacco and cigarette papers, fireworks, mobile phones or recording devices, pornographic images and any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property.

11. PEER ON PEER ABUSE

The school has a strong commitment to an anti-bullying policy and will consider all coercive acts and peer on peer abuse within a Child Protection context. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the school's behaviour policy.

Occasionally, allegation may be of a peer on peer abuse nature, which may include physical abuse (violence, particularly pre-planned, forcing other children to use drugs or alcohol), emotional abuse (blackmail or extortion, threats and intimidation), sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting) and sexual exploitation (encouraging other children to engage in inappropriate sexual behaviour, having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited

children, staying out overnight, photographing or videoing other children performing indecent acts). Sexual harassment can take place both online and offline (examples include sexual 'jokes' or comments. 'Upskirting' typically involves taking a picture under a person's clothing without them knowing with the intention of causing distress, humiliation or alarm. This is now a criminal offence.

Staff are aware that the initial response to a report from a child is important. It is essential that all victims are reassured and that they are being taken seriously and that they will be supported and kept safe.

Any possible peer on peer abuse case will be shared with the designated safeguarding lead who will report to the Headteacher for the appropriate action with a view to referring to appropriate agencies following the referral procedures.

We will always ascertain the views and feelings of all children. We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or other children.

12. VOLUNTEERS

Any parent or other person/organisation engaged by the school to work in a voluntary capacity with pupils will be subject to all reasonable vetting procedures and Criminal Records Checks, unless they are in unregulated activity, therefore they are always supervised by a member of staff or Governing Committee who has been checked.

Volunteers who on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in our school are deemed to be in regulated activity. We will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, we may conduct a repeat DBS check (which will include barred list information) on any such volunteer should we have any concerns.

Further information on checks on volunteers can be found in Part three of the DfE guidance "*Keeping children safe in education*".

13. WHISTLEBLOWING

If a member of staff suspects that there is a serious safeguarding issue that they feel that the Headteacher is not taking seriously or that they believe there is a serious safeguarding issue involving the Headteacher they should in the first instance contact the Chair of Governors via email Chair@ManorHill.org or MASH or NSPCO whistleblowing helpline – 0800 028 0285

14. ONLINE SAFETY

Pupils at Manor Hill School have no access to any computer equipment or internet access within the School.

15. PARENTAL AWARENESS OF SAFEGUARDING

Parents will be informed through the school's website as to any Safeguarding issues.

16. THE ROLE OF THE GOVERNING COMMITTEE

The Governing Committee will ensure that they comply with their duties under legislation and that the policies, procedures and training in the school are effective and comply with the law at all times.

The Governing Committee will ensure that the school contributes to inter-agency working in line with statutory guidance "*Working Together to Safeguard Children*" and that the school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the SSCB.

The Governing Committee has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the Chair of Governors or the Headteacher.

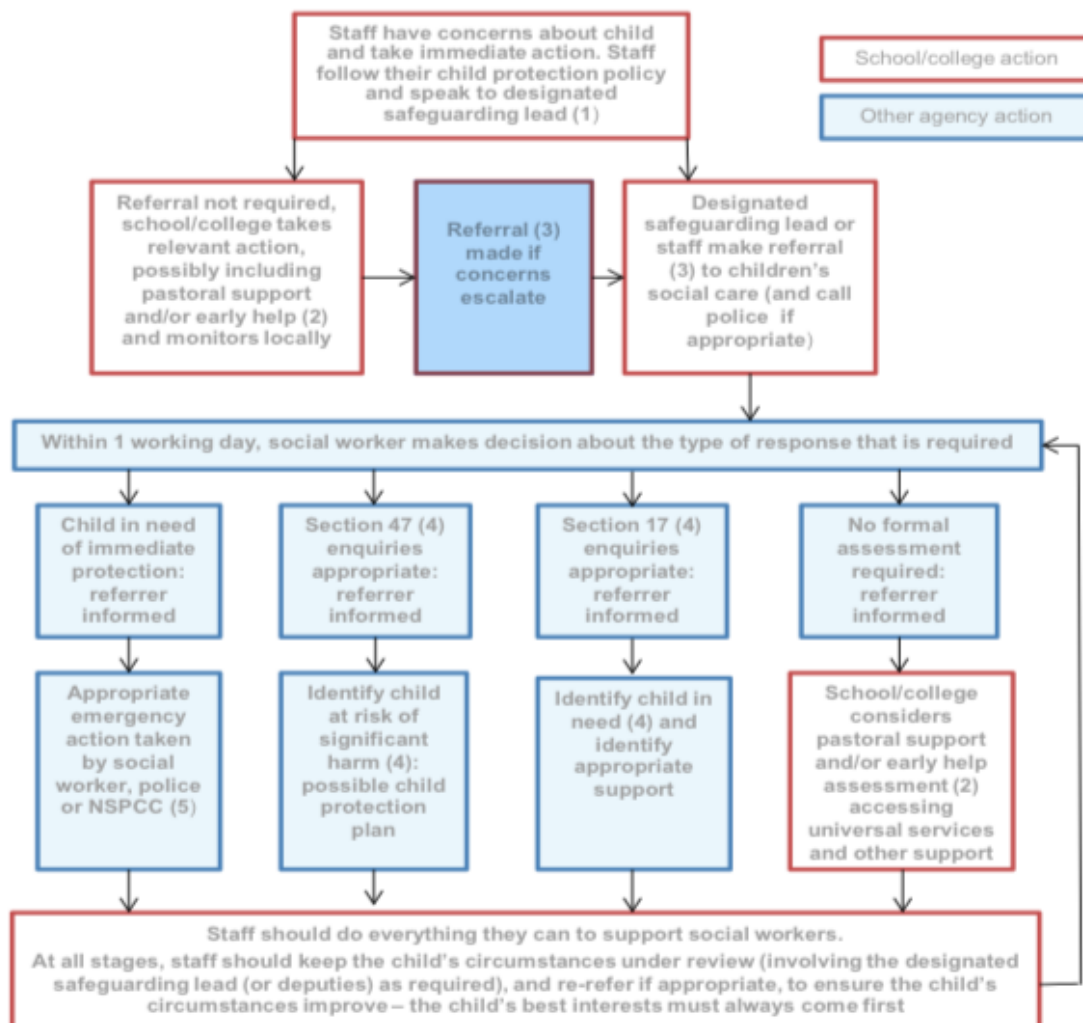
The Governing Committee nominates a Child Protection Governor Lead to take leadership responsibility for the school's safeguarding arrangements.

Concerns about and allegations of abuse made against the Headteacher will be referred to the Chair of governors who will liaise with the LA's designated officer (LADO) and partner agencies and will attend any strategy meetings called in respect of such an allegation against the Headteacher.

As good practice, the Headteacher will provide termly/annual report to the Governing Committee outlining details of any safeguarding issues that have arisen during the term/year and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

17. MONITORING AND EVALUATION

The Child Protection and Safeguarding issues will continue to be a standing item on the Full Governing Committee agendas. It is the responsibility of the Designated Child Protection Governor to ensure the policy is reviewed annually.



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

APPENDIX I: **SAFER RECRUITMENT**

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

Pre-employment checks

The governing board/Head Teacher will assess the suitability of prospective employees by:

- Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available.
- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
- Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the TRA Teacher Services' System.
- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.
- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.UK website will be followed.
- If the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.
- Checking professional experience, QTS and qualifications as appropriate using Teacher Services.

An enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

Internal candidates

References from internal candidates will always be scrutinised before appointment.

Trustees/Governors

Enhanced DBS checks on all members of the governing committee and mother's committee. Before an individual becomes a trustee, the school will carry out an enhanced DBS check and confirm their identity. Where a trustee also engages in regulated activity, a barred list check will also be requested. An additional check is required for those in management positions, to ensure that they are not prohibited under section 128 provisions. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check. If the individual lives or has lived outside of the UK, consideration will be given as to further checks that may be necessary.

Those who have lived or worked outside of the UK: for those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.

Barred list check

An enhanced DBS check may be requested for anyone working in school that is not in regulated activity but does not have a barred list check.

If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment.

References

References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.

References will only be accepted from a senior person and not from a colleague.

References will be sought on all short-listed candidates, including internal ones, before or after an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.

Open testimonials will not be considered.

Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

Volunteers

No volunteer will be left unsupervised with a pupil or allowed to work in regulated activity until the necessary checks have been obtained.

An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.

Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.

A supervised volunteer who regularly teaches or looks after children is not in regulated activity.

The school will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.

Unless there is cause for concern, the school will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.

A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

Associate members

Associate members (i.e. individuals that are appointed by the governing board to serve on one or more committees) will not be required to obtain enhanced DBS checks.

Data retention

DBS certificates and other documents will be kept for the personnel file with permission and will be securely destroyed as soon as practicable.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Single central record (SCR)

The school keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- [Academies, free schools and independent schools only] A section 128 check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.
- If any checks have been conducted for volunteers, this will also be recorded on the SCR.
- If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.

A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the declaration form provided in the appendices of this policy confirming that they are not disqualified from working in a schooling environment.

A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

Training

Staff members will undergo safeguarding and child protection training at induction, which will be regularly updated on an annual basis or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Behavioural Policy
- The Staff Code of Conduct
- The safeguarding response to children who go missing from education
- The identity of the DSL and any deputies
- The role of the DSL and deputy DSLs
- All staff members will also receive regular safeguarding and child protection updates as required, but at least annually.
- Training will cover, at a minimum:
- The issues surrounding sexual violence and sexual harassment.

APPENDIX II

FURTHER CAUSES OF CONCERN, PROCEDURES AND RESPONSIBILITIES

Female Genital Mutilation (FGM)

For the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs. FGM is considered a form of abuse in the UK and is illegal.

All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care and/or the police.

Teaching staff are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.

NB. The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

There are a range of potential indicators that a pupil may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the pupil.

Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that may show a heightened risk of FGM include the following:

- The socio-economic position of the family and their level of integration into UK society
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE

Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the following:

- Difficulty walking, sitting or standing

- Spending longer than normal in the bathroom or toilet
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Prolonged or repeated absences from school followed by withdrawal or depression
- Reluctance to undergo normal medical examinations
- Asking for help, but not being explicit about the problem due to embarrassment or fear

Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

FGM is also included in the definition of 'honour-based' violence (HBV), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

All forms of HBV are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBV, including concerns that a child is at risk of HBV, or has already suffered from HBV, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Forced marriage

For the purpose of this policy, a "forced marriage" is defined as a marriage that is 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 the marriage. Forced marriage is classed as a crime in the UK.

As part of HBV, staff will be alert to the signs of forced marriage including, but not limited to, the following:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia
- Displaying a sudden decline in their educational performance, aspirations or motivation
- Regularly being absent from school
- Displaying a decline in punctuality
- An obvious family history of older siblings leaving education early and marrying early

If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

Child sexual exploitation (CSE)

For the purpose of this policy, “child sexual exploitation” is defined as: a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or increased status of the perpetrator or facilitator
- CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

The school has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

- Identifying cases
- School staff members are aware of and look for the key indicators of CSE; these are as follows:
 - Going missing for periods of time or regularly going home late
 - Regularly missing lessons
 - Appearing with unexplained gifts and new possessions
 - Associating with other young people involved in exploitation
 - Having older boyfriends or girlfriends
 - Undergoing mood swings or drastic changes in emotional wellbeing
 - Displaying inappropriate sexualised behaviour
 - Suffering from sexually transmitted infections or becoming pregnant
 - Displaying changes in emotional wellbeing
 - Misusing drugs or alcohol
- Referring cases

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Homelessness

The DSL and deputy(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to”
- Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

County lines criminal activity

For the purpose of this policy, “County lines criminal activity” refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.

Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis.

Indicators that a pupil may be involved in county lines active include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in school results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to, the following:

- Increased absence from school
- A change in friendships
- New relationships with older individuals or groups
- A significant decline in academic performance
- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions

Staff will be made aware of some of the most significant risk factors that could increase a pupil’s vulnerability to becoming involved in serious violent crime.

These risk factors include, but are not limited to, the following:

- A history of committing offences
- Substance abuse
- Anti-social behaviour
- Truancy
- Peers involved in crime and/or anti-social behaviour

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary.

They will receive a copy of 'Are you a young person with a family member in prison' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

[Primary schools only] Pupils will also be provided with the booklet 'Going to Court' from HM Courts and Tribunals Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.

[Secondary schools only] Pupils will also be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Contextual safeguarding

Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and their deputy(s), will always consider the context of incidents – this is known as contextual safeguarding.

Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

The school will provide as much contextual information as possible when making referrals to CSCS.

Preventing radicalisation

For the purpose of this policy, "radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies.

Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.

The school will actively assess the risk of pupils being drawn into terrorism.

Staff will be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection.

Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.

Any concerns over radicalisation will be discussed with a child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

Training

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

Risk indicators of vulnerable pupils

Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society
- Indicators of a personal crisis include the following:
 - Family tensions
 - A sense of isolation
 - Low self-esteem
 - Disassociation from existing friendship groups
 - Searching for answers to questions about identity, faith and belonging

Indicators of vulnerability through personal circumstances includes the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure

- Rejection of civic life
- Indicators of vulnerability through criminality:
- Experiences of dealing with the police

Involvement with criminal groups

Making a judgement

When making a judgement, staff will ask themselves the following questions:

Does the pupil have access to extremist influences?

Does the pupil access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?

Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?

Is the pupil known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?

Does the pupil sympathise with or support illegal/illicit groups?

Does the pupil support groups with links to extremist activity?

Has the pupil encountered peer, social, family or faith group rejection?

Is there evidence of extremist ideological, political or religious influence on the pupil?

Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?

Has there been a significant shift in the pupil's outward appearance that suggests a new social, political or religious influence?

Has the pupil come into conflict with family over religious beliefs, lifestyle or dress choices?

Does the pupil vocally support terrorist attacks, either verbally or in their written work?

Has the pupil witnessed or been the victim of racial or religious hate crimes?
Is there a pattern of regular or extended travel within the UK?

Has the pupil travelled for extended periods of time to international locations?
Has the pupil employed any methods to disguise their identity?

Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?

Does the pupil display a lack of affinity or understanding for others?

Is the pupil the victim of social isolation?

Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?

Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?

Does the pupil have insecure, conflicted or absent family relationships?

Has the pupil experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?

Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?

Critical indicators include where the pupil is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

Channel programme

Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable pupil is at risk of being involved in terrorist activities.

In cases where the school believes a pupil is potentially at serious risk of being radicalised, the headteacher or DSL will contact the Channel programme.

The DSL will also support any staff making referrals to the Channel programme.

The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.

The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

Extremist speakers

The Guest Speaker Policy will prevent speakers who may promote extremist views from using the school premises.

Building children's resilience

The school will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British values, alongside pupils' spiritual, moral, social and cultural development.
- Allow pupils time to explore sensitive and controversial issues.
- Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach pupils about how democracy, government and law making/enforcement occur.
- Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Resources

The school will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The Educate Against Hate website

Risk indicators of vulnerable pupils

Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

Indicators of a personal crisis include the following:

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

Indicators of vulnerability through personal circumstances includes the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life

Indicators of vulnerability through criminality:

- Experiences of dealing with the police
- Involvement with criminal groups

Pupils with SEND

The school recognises that pupils with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of pupils.

Staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration.

When managing a safeguarding issue relating to a pupil with SEND, the **DSL** will liaise with the pupil's family where appropriate, to ensure that the pupil's needs are effectively met.

Private fostering

Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

Concerns about a pupil

If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or a deputy.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in this policy.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL with the matter.

If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer.

Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil.

If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered.

All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely in **a locked cabinet** in the **school office**.

If a pupil is in immediate danger, a referral will be made to MASH and/or the police immediately.

If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views.

When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life.

Any pupil may benefit from early help, but in particular staff will be alert to the potential need for early help for pupils who:

- Have SEND (whether or not they have a statutory EHC plan).
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.

Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

All staff will be made aware of the local early help process and understand their role in it.

The DSL will take the lead where early help is appropriate.

Managing referrals

The reporting and referral process outlined in this policy will be followed accordingly. All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed.

When making a referral to MASH or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved.

The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. **Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.**

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS.

Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm.

Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so.

Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm.

The school will work closely with parents to ensure that the pupil, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

Allegations of abuse against other pupils (peer-on-peer abuse)

Sexual harassment

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a pupil's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment includes:

- Sexual comments.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against another pupil.
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

Sexual violence

Sexual violence refers to the three following offences:

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

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

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

Harmful sexual behaviours

The term “**harmful sexual behaviour**” is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage.

Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not) and where the child may have SEND.

A preventative approach

In order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the school will remind pupils of behavioural expectations. They will also be reminded of the role of the DSL and deputy and will be informed on how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.

Awareness

All staff will be aware that pupils of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.

All staff will be aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.

All staff will be made aware of the heightened vulnerability of pupils with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil’s SEND and will always explore indicators further.

LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children.

The school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

Support available if a child has been harmed, is in immediate danger or at risk of harm

If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to MASH.

Within one working day, a social worker will respond to the referrer to explain the action that will be taken.

Support available if early help, section 17 and/or section 47 statutory assessments are appropriate

If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

Support available if a crime may have been committed

Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to CSCS. The DSL will be aware of the local process for referrals to both CSCS and the police.

Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.

The school has a close relationship with the local police force and the DSL will liaise closely with the local police presence.

Support available if reports include online behaviour

Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

If the incident involves sexual images or videos held online, the Internet Watch Foundation will be consulted to have the material removed.

Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

Risk assessment

The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

Risk assessments will consider:

- The victim.
- The alleged perpetrator.
- Other children at the school, especially any actions that are appropriate to protect them.

Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's **Data Protection Policy**.

Taking action following a disclosure

The DSL or a deputy will decide the school's initial response, taking into consideration:

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the children involved.
- Any power imbalance between the children.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
- The best interests of the child.
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.

For reports of rape and assault by penetration, whilst the school establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.

For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.

In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

Managing the report

The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

There are four likely outcomes when managing reports of sexual violence or sexual harassment:

- Managing internally
- Providing early help
- Referring to CSCS
- Reporting to the police

Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.

The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.

Rape, assault by penetration and sexual assault are defined in law.

Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Managing internally

In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

Providing early help

The school may decide that statutory interventions are not required, but that pupils may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Referral to children's social care services (CSCS)

If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to children's social care services (CSCS). Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with CSCS.

The school will not wait for the outcome of an investigation before protecting the victim and other children.

The DSL will work closely with CSCS to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.

If CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.

If the school agrees with the decision made by CSCS, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

Reporting to the police

Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to CSCS. The DSL and deputies will follow the local process for referral.

Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with CSCS and any appropriate specialist agencies.

The DSL and **governing board** will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.

The DSL will be aware of local arrangements and specialist units that investigate child abuse.

In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

Victims

Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.

The school will provide a physical space for victims to withdraw to.

Victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies.

Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.

If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents.

If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

Ongoing support for the alleged perpetrator

When considering the support required for an alleged perpetrator, the school will take into account:

- The terminology they use to describe the alleged perpetrator or perpetrator.
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
- Their age and developmental stage.
- What a proportionate response looks like.
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.

When making a decision, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.

The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

Disciplining the alleged perpetrator

Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.

The school will make such decisions on a case-by-case basis, with the DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.

The school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.

Disciplinary action and support can take place at the same time.

The school will be clear whether action taken is disciplinary, supportive or both.

Shared classes

Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of the pupil will always come first.

Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other pupils.

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents and carers

In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made

available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

Clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

Safeguarding other children

Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.

It is likely that children will “take sides” following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

As part of the school’s risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

Approved by the Governing Committee

Reviewed 27th October 2019

Signed: Nicoletta Kessarlis..... (For the Governing Committee)

Date: 27thOctober 2019

Signed: Michael Ellinas..... (Head Teacher)

Date: 27thOctober 2019

Monitoring and review

This policy is reviewed annually by the DSL/Head Teacher and the Governing committee. Any changes made to this policy will be communicated to all members of staff.

All members of staff are required to familiarize themselves with all processes and procedures outlined in this policy as part of their induction programme.

The next scheduled review date for this policy is October 2020.