



September 2022 – September 2023

# Safeguarding & Child Protection Policy



**WATERTON**  
ACADEMY TRUST®

## Contents

<b>1. Our School .....</b>	<b>6</b>
1.1 Our Vision .....	6
1.2 Our Values .....	6
1.3 Our Golden Rule.....	6
<b>2. Policy Summary .....</b>	<b>7</b>
2.1 Policy Introduction & Rationale .....	7
2.2 Policy Aims .....	7
2.3 Inclusivity Statement.....	7
<b>3. Legalities &amp; Linked Documents .....</b>	<b>7</b>
3.1 Linked School & Trust Policies.....	7
3.2 Linked National & Local Documents .....	8
<b>4. Key Personnel &amp; Contacts .....</b>	<b>8</b>
4.1 Designated Leaders.....	8
4.2 Other Useful Contacts.....	9
<b>5. Definitions .....</b>	<b>9</b>
5.1 Safeguarding .....	9
5.2 Child Protection .....	9
5.3 Abuse .....	10
5.4 Neglect.....	10
5.5 Sharing of Nudes & Semi-Nudes .....	10
5.5 Children .....	10
5.6 Victim.....	10
5.7 Alleged Perpetrator(s) & Perpetrator(s) .....	10
5.9 Safeguarding Partners .....	10
<b>6. Roles &amp; Responsibilities .....</b>	<b>11</b>
6.1 All Staff.....	11
6.1 The Designated Safeguarding Leader (DSL) .....	11
6.2 The Academy Standards Committee .....	12
6.3 CEO/ Trust Staff.....	13
6.4 The Headteacher .....	13
6.5 Virtual School Heads.....	13
<b>7. Confidentiality .....</b>	<b>13</b>
<b>8. Recognising Abuse &amp; Taking Action .....</b>	<b>14</b>
8.1 If a Child is Suffering or Likely to Suffer Harm, or in Immediate Danger.....	14
8.2 If a Child Makes a Disclosure.....	14
8.3 FGM or Suspected FGM.....	14
8.4 Concerns About Extremism.....	15



8.5 Mental Health Concerns.....	15
8.6 Early Help Assessment (EHA) .....	15
8.7 Referrals.....	15
8.8 LA Procedures for Concerns (But Not Immediate Danger).....	16
8.9 Concerns About a Staff Member, Supply Teacher, Volunteer or Contractor .....	17
8.9.1 Allegations of Abuse Made Against Pupils .....	17
8.9.2 Procedures for Allegations of Abuse Against Pupils .....	17
8.9.3 Creating a Supportive Environment and Minimising the Risk of CoC Abuse.....	19
8.9.4 Sharing of Nudes & Semi-Nudes (Sexting).....	20
8.9.5 Sharing of Nudes & Semi-Nudes Initial Review Meeting.....	20
8.9.6 Sharing of Nudes or Semi-Nudes Further Review by the DSL.....	21
8.9.7 Sharing of Nudes or Semi-Nudes Informing Parents/Carers.....	21
8.9.8 Sharing of Nudes or Semi-Nudes Referring to the Police.....	21
8.9.9 Sharing of Nudes or Semi-Nudes Recording incidents .....	21
8.9.9.1 Sharing of Nudes or Semi-Nudes Curriculum coverage .....	21
8.9.9.2 Reporting Systems for Pupils .....	21
<b>9. Online Safety &amp; Mobile Technology .....</b>	<b>22</b>
9.1 Four Categories of Risk .....	22
<b>10. Notifying Parents &amp; Carers .....</b>	<b>23</b>
<b>11. Pupils with Additional Needs.....</b>	<b>23</b>
<b>12. Pupils With a Social Worker .....</b>	<b>24</b>
<b>13. Looked-After Children and PLAC .....</b>	<b>24</b>
<b>14. Complaints &amp; Concerns About School Safeguarding Policies .....</b>	<b>24</b>
14.1 Complaints Against Staff.....	24
14.2 Other Complaints .....	24
14.3 Whistle-Blowing.....	24
<b>15. Record Keeping .....</b>	<b>25</b>
<b>16. Training .....</b>	<b>25</b>
16.1 All Staff .....	25
16.2 The DSL & DDSLs .....	26
16.3 Academy Standards Committee .....	26
16.4 Recruitment.....	26
16.5 Staff Who Have Contact With Families .....	26
<b>17. Monitoring Arrangements .....</b>	<b>26</b>
<b>Appendix 1. Types of Abuse .....</b>	<b>27</b>
A1.1 Physical Abuse .....	27
A1.2 Emotional Abuse.....	27
A1.3 Sexual Abuse .....	27
A1.4 Neglect.....	27



A1.5 Sexting & Sharing of Indecent Images.....	28
A1.6 Teenage Relationship Abuse.....	28
A1.7 Female Genital Mutilation (FGM) .....	28
A1.8 Breast-Ironing.....	29
A1.9 Cyberbullying.....	29
A1.9.1 Domestic Abuse & Violence.....	29
A.1.9.2 Faith Abuse .....	29
A1.9.3 Honour-Based Abuse/Violence .....	29
A1.9.4 Controlling or Coercive Behaviour .....	30
A1.9.5 Child-on-Child Abuse.....	30
A1.9.6 Upskirting.....	30
A1.9.7 Child Sexual Exploitation (CSE).....	30
A1.9.8 County Lines.....	31
A.1.9.9 Radicalisation .....	31
A1.9.9.1 Forced Marriage .....	32
A1.9.9.2 Gangs & Youth Violence .....	32
A1.9.9.3 Private Fostering.....	33
A1.9.9.4 Trafficking .....	33
<b>Appendix 2. Other Safeguarding Issues Impacting Children.....</b>	<b>34</b>
A2.1 Children and the Court System .....	34
A2.2 Children Missing From Education.....	34
A2.3 Children with Family Members in Prison.....	34
A2.4 Homelessness & Poverty.....	34
A2.5 Child Criminal Exploitation.....	35
A2.6 Checking the Identity & Suitability of Visitors.....	35
A2.7 Sexual Violence & Sexual Harassment Between Children .....	35
<b>Appendix 3. Safer Recruitment.....</b>	<b>37</b>
A3.1 Advertising .....	37
A3.2 Application Forms.....	37
A3.3 Shortlisting .....	37
A3.4 Seeking References and Checking Employment History .....	37
A3.5 Interview and Selection.....	38
A3.6 Pre-Appointment Vetting Checks.....	38
A3.7 New Staff .....	38
A3.8 Regulated Activity.....	39
A3.9 Existing Staff.....	39
A3.9.1 Agency and Third-Party Staff.....	39
A3.9.2 Contractors .....	39
A3.9.3 Trainee/Student Teachers.....	40



A3.9.4 Volunteers .....	40
A3.9.5 Governors & Trust Members .....	40
A3.9.6 Staff Working in Alternative Provision Settings .....	40
<b>Appendix 4. Allegations of Abuse Against Staff .....</b>	<b>41</b>
A4.1 Allegations Against Staff .....	41
A4.2 Suspension Until a Case is Resolved.....	41
A4.3 Definitions for Outcomes of Allegations Investigations .....	41
A4.4 Procedures for Dealing with Allegations .....	42
A4.5 Additional Considerations for Supply Teachers and all Contracted Staff .....	43
A4.6 Timescales .....	43
A4.7 Specific Actions Following a Criminal Investigation .....	43
A4.8 Conclusion of a Case Where the Allegation is Substantiated.....	43
4.9 Individuals Returning to Work After Suspension.....	43
4.9.1 Unsubstantiated, Unfounded, False or Malicious Reports.....	44
4.9.2 Unsubstantiated, Unfounded, False or Malicious Allegations.....	44
4.9.3 Confidentiality & Information Sharing.....	44
4.9.4 Record-Keeping.....	44
4.9.5 References.....	44
4.9.6 Learning Lessons .....	45
4.9.7 Non-Recent Allegations .....	45
4.9.8 Concerns that Do Not Meet The Threshold .....	45
4.9.9 Definition of Low-Level Concerns .....	45
4.9.9.1 Sharing Low-Level Concerns .....	46
4.9.9.2 Responding to Low-Level Concerns .....	46
4.9.9.3 Record Keeping .....	46
4.9.9.4 References .....	46



## 1. Our School

### 1.1 Our Vision

**Grow. Achieve. Shine** – These are much more than words or a motto. At Churchfield Primary School we enable all children to **grow** as independent learners, **achieve** more than they ever believe they could and **shine** as unique individuals. Our school is a very special place, having been the beating heart of our community for over 120 years, we respect the lessons of the past whilst looking to the difference we can make in the future. Preparing our pupils for life in an ever-changing world, developing curious, well-rounded individuals who are determined to succeed.

### 1.2 Our Values



**We are proud, and work hard to be the best that we can be**



**We are determined and resilient, embracing all challenges**



**We collaborate well, treating everyone as equals**



**We are honest, kind and show integrity**



**We respect all people, property and the environment**



**We believe in ourselves and strive for our goals**

### 1.3 Our Golden Rule

**We keep ourselves, and each other, safe.**

THE GOLDEN RULE



## 2. Policy Summary

### 2.1 Policy Introduction & Rationale

At Churchfield Primary School the happiness, safety and well-being of every child is our paramount concern. Safeguarding is a golden thread that runs throughout school, and our Golden Rule is '**We Keep Ourselves & Each Other Safe**'. We listen to our pupils and take what they tell us seriously. Safeguarding pupils is the prime responsibility of every member of school staff, and every person that walks through our doors. Safeguarding does not stop at the school gate, and we must do all we can to protect children both in, and out, of school. Safeguarding needs no rationale, as it is the at the centre of everything that we do in school, and the single most important aspect of working with children. We believe that a policy on child protection is founded on the right of all children to be safe. We expect all members of the school community including staff, governors, supply staff and volunteers to share this commitment. Every member of the school community is responsible for contributing to a positive culture of safeguarding. The aim of this policy is to provide staff, supply staff, governors and volunteers with the framework they need to keep children at Churchfield Primary School safe and secure and to provide parents and carers with the information about how we will safeguard their children whilst in our care.

### 2.2 Policy Aims

This policy is underpinned by the central aims of Churchfield Primary School and the values held by the school community. This policy aims to:

- Provide information for all stakeholders on the safeguarding processes in school.
- Provide information for all stakeholders on safeguarding personnel in school.
- Ensure that children are effectively safeguarded from the potential risk of harm at our school and that the safety and well-being of the children is of the highest priority in all aspects of school's work.
- Help the school maintain its ethos whereby staff, pupil, parents and governors feel able to articulate any concerns comfortably, safe in the knowledge that effective action will be taken as appropriate.

### 2.3 Inclusivity Statement

At Churchfield Primary School we use an inclusive approach to all aspects of education. Our aim is to always involve all children and stakeholders in all areas of the curriculum and school life. In accordance with the SEND Code of Practice, we recognise that this may mean making special adaptations or arrangements from time to time for children with specific disabilities. We welcome the involvement of disabled adults in all areas of school life.

## 3. Legalities & Linked Documents

### 3.1 Linked School & Trust Policies

This policy should be read in conjunction with the following policies and other linked policies:

- Anti-bullying
- Attendance & Punctuality
- Rewards & Behaviour
- Looked After Children
- Children Protection & Safeguarding Statement
- Equality
- SEND & Inclusion
- Health & Safety
- Supporting Students with Medical Needs
- Online Safety
- Staff Code of Conduct



- Whistleblowing
- Safer Recruitment

### 3.2 Linked National & Local Documents

The policy has been developed in accordance with the following legislation and guidance:

- [Children Act](#)
- [Serious Crime Act \(Section 74 FGM\)](#)
- [Working together to Safeguard Children](#)
- [Keeping Children Safe in Education](#)
- [Information Sharing Guidance for Safeguarding Practitioners](#)
- [Children Missing Education: Statutory Guidance](#)
- [Prevent Duty Guidance](#)
- [Sexual Violence & Sexual Harassment Between Children in Schools & Colleges](#)
- [The Equality Act](#)
- [Statutory Guidance on Female Genital Mutilation](#)
- [Child Abuse Linked to Faith or Belief National Action Plan](#)
- [DFE Behaviour in Schools](#)
- [Education Act](#)
- [Education Regulations](#)
- [Rehabilitation of Offenders Act](#)
- [Safeguarding Vulnerable Groups Act](#)
- [Human Rights Act](#)
- [Public Sector Equality Duty](#)
- [School Staffing Regulations](#)
- [Childcare Disqualifications Regulations](#)
- [EYFS Statutory Framework](#)
- [Barnsley Safeguarding Children Partnership Procedures](#)

## 4. Key Personnel & Contacts

### 4.1 Designated Leaders

Safeguarding is the responsibility of every member of our school community, both in and out of school. Below are the details for members of staff with a particular responsibility:

Role	Name & Contact Details
Designated Safeguarding Leader	Tracy Phillips 01226 710523 (Option 2) <a href="mailto:t.phillips@watertonacademytrust.org">t.phillips@watertonacademytrust.org</a>
Deputy Designated Safeguarding Leader Designated Teacher for Looked After Children Headteacher	Jonathan Bean 01226 710523 <a href="mailto:j.bean@watertonacademytrust.org">j.bean@watertonacademytrust.org</a>
Deputy Designated Safeguarding Leader Deputy Headteacher	Michelle Foster 01226 710523 <a href="mailto:m.foster@watertonacademytrust.org">m.foster@watertonacademytrust.org</a>
Deputy Designated Safeguarding Leader SENDCO	Emily Nelson 01226 710523 (Option 2) <a href="mailto:e.nelson@watertonacademytrust.org">e.nelson@watertonacademytrust.org</a>





Deputy Designated Safeguarding Leader KS1 Phase Leader	Sally Bean 01226 710523 <a href="mailto:s.bean@watertonacademytrust.org">s.bean@watertonacademytrust.org</a>
Deputy Designated Safeguarding Leader LKS2 Phase Leader	Danni Wigston 01226 710523 <a href="mailto:d.wigston@watertonacademytrust.org">d.wigston@watertonacademytrust.org</a>
Designated Safeguarding Governor	Yvonne Gray 01226 710523 <a href="mailto:ygray@watertonacademytrust.org">ygray@watertonacademytrust.org</a>
Local Authority Designated Officer (LADO)	Ruth Holmes 01226 772400 <a href="mailto:RuthHolmes@barnsley.gov.uk">RuthHolmes@barnsley.gov.uk</a>
Chief Executive Officer	Dave Dickinson 01924 240767 <a href="mailto:admin@watertonacademytrust.org">admin@watertonacademytrust.org</a>
Chair of Trustees	Steve Johnson 01924 240767 <a href="mailto:admin@watertonacademytrust.org">admin@watertonacademytrust.org</a>

#### 4.2 Other Useful Contacts

Agency	Contact Details/ Info
Barnsley Safeguarding Children Partnership	01226 775859
Barnsley Family Information Service	0800 0345 340
Safeguarding Adults Team	01226 775832
Youth Offending Team	01226 774986
CAFCASS	0300 4564000
Education Welfare Service	01226 773543
Children's Social Care	01226 772423
Children's Social Care (Out of Hours)	01226 787789
NSPCC	0800 800 5000
Childline	0800 11 11
Kidscape - Parent Advice Line (Bullying)	020 7823 5430
NSPCC Female Genital Mutilation Helpline	0800 028 3550
Samaritans	116 123
CEOP	0370 496 7622

## 5. Definitions

### 5.1 Safeguarding

Safeguarding and promoting the welfare of children means:

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

### 5.2 Child Protection

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



### 5.3 Abuse

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

### 5.4 Neglect

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.

### 5.5 Sharing of Nudes & Semi-Nudes

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.

### 5.5 Children

Children includes everyone under the age of 18.

### 5.6 Victim

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

### 5.7 Alleged Perpetrator(s) & Perpetrator(s)

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

### 5.9 Safeguarding Partners

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

- Barnsley Metropolitan Borough Council (BMBC)
- NHS South Yorkshire Integrated Care Board
- South Yorkshire Police

The following organisations are partnership members:

- South West Yorkshire Partnership NHS Foundation trust
- Barnsley Hospital NHS Foundation Trust
- NHS England
- South Yorkshire Fire & Rescue
- National Probation Service
- CAFCASS
- IDAS
- Berneslai Homes
- BMBC Children's Social Care
- BMBC Legal Services
- BMBC Public Health
- BMBC Youth Offending Team
- Barnsley College
- Healthwatch Barnsley



- Headteacher Representative – Barnsley Primary Schools
- Headteacher Representative – Barnsley Secondary Schools
- Barnsley Council Cabinet Spokesperson

## 6. Roles & Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities. School plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

### 6.1 All Staff

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
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT to speak out and share their concerns

All staff must be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff handbook & WAT Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputy designated safeguarding leaders (DDSL), the behaviour policy, online safety policy and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection. Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this

### 6.1 The Designated Safeguarding Leader (DSL)

The DSL is a member of the senior leadership team. Our DSL is Tracy Phillips (Wellbeing Manager). The DSL takes lead responsibility for child protection and wider safeguarding in the school. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours the DSL can be contacted



via email (see key contacts) or phone (number available on request). When the DSL is absent, the identified DDSLs will act as cover. DDSLs are Jonathan Bean, Michelle Foster, Emily Nelson, Sally Bean & Danni Wigston.

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

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

The DSL will also:

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

## 6.2 The Academy Standards Committee

The ASC will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a Governor to the Link Member for Safeguarding to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The Link Member is Yvonne Gray
- Read Keeping Children Safe in Education in its entirety

The ASC will make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors)



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

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

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

### 6.3 CEO/ Trust Staff

The CEO will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

### 6.4 The Headteacher

The headteacher is responsible for the implementation of this policy, including:

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

### 6.5 Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

## 7. Confidentiality

School, and all members of staff at the school, will ensure that all data about pupils is handled in accordance with the requirements of the law, and any national and local guidance. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Any member of staff who has access to sensitive information about a child or the child's family must take all reasonable steps to ensure that such information is only disclosed to those people who need to know. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. Regardless of the duty of confidentiality, if any member of staff has reason to believe that a child may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the designated member of staff for child protection: timely information sharing is essential to effective safeguarding. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain



consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests. The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

## 8. Recognising Abuse & Taking Action

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

### 8.1 If a Child is Suffering or Likely to Suffer Harm, or in Immediate Danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly. If you think a child is in immediate danger, call the police on 999 or 01226 2202020.

### 8.2 If a Child Makes a Disclosure

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and speak to the DSL immediately. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers
- None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child

### 8.3 FGM or Suspected 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 the appendix 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 action 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 should speak to the DSL and follow our safeguarding procedures by completing a Cause for Concern form.

#### 8.4 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. 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

It is essential that staff have an awareness that extremism can be based on a varying range of political or religious ideologies.

#### 8.5 Mental Health Concerns

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by informing the DSL.

#### 8.6 Early Help Assessment (EHA)

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements. The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. A referral form will be completed and sent to the Early Help Team. More information on the EHA process can be found here: <https://www.barnsley.gov.uk/services/children-families-and-education/early-help-for-families/how-to-get-early-help/>

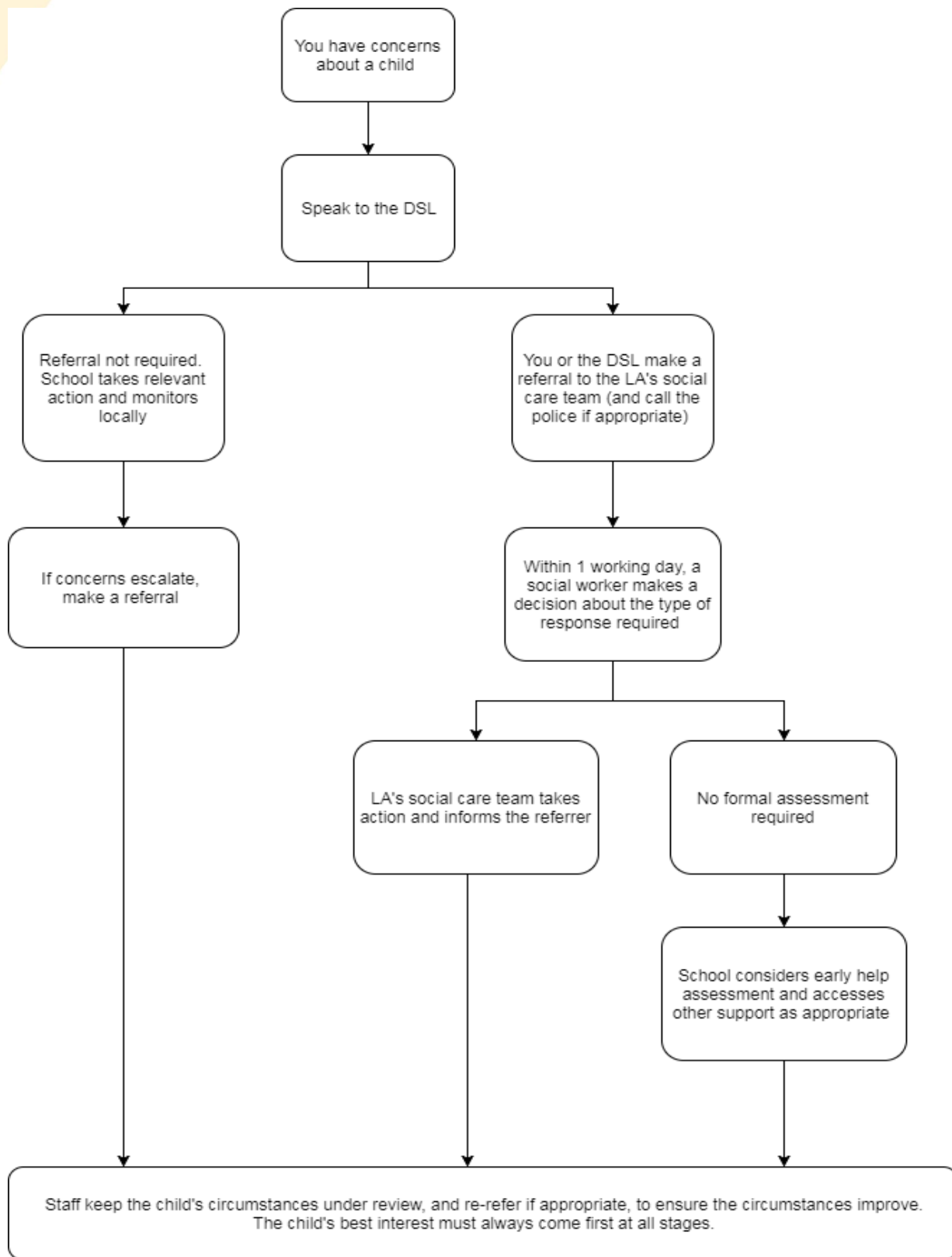
#### 8.7 Referrals

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly, you must tell the DSL as soon as possible. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local



authority if this information is not made available, and ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

**8.8 LA Procedures for Concerns (But Not Immediate Danger)**





### 8.9 Concerns About a Staff Member, Supply Teacher, Volunteer or Contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the CEO. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

#### 8.9.1 Allegations of Abuse Made Against 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 child-on-child abuse. However, all child-on-child 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, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

#### 8.9.2 Procedures for Allegations of Abuse Against Pupils

The DSL (or a deputy) will take the lead, supported by other agencies as required.

##### **A. Where there’s been a report of child-on-child sexual abuse, the DSL (or a deputy) should make an immediate risk and needs assessment, considering:**

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator(s)
- All other children at the school (and adult students and staff, if appropriate), especially any actions that are appropriate to protect them
- Where there’s been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.
- Record these risk assessments and keep them under review.



**B. The DSL (or a deputy) should engage with children's social care and specialist services as required:**

- Where there's been a report of sexual violence, the risk assessment will likely need input from social workers or sexual violence specialists within the local multi-agency safeguarding team (MAST)
- Use any MAST assessments to inform school's approach and update the risk assessment accordingly

**C. Determine how to manage and/or escalate the report:**

The DSL should be aware of, and respond appropriately, to all reports and concerns about sexual violence and/or harassment both online and offline, including those that have happened outside of school. The DSL (or a deputy) will decide how to manage the report, including when to inform the alleged perpetrator(s). This depends on a number of important considerations, including:

- The wishes of the victim and how they want to proceed – you should balance these against your responsibility to protect other children
- The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour
- The ages and developmental stages of the children involved
- Any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- Whether the alleged incident is a one-off or part of a sustained pattern of abuse
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Whether there are ongoing risks to the victim (or anyone else)
- Any related issues and wider context, including links to child sexual exploitation and child criminal exploitation

**D. Decide which of these 4 scenarios apply**

- Manage internally, where this is considered appropriate in the circumstances, and early help or statutory interventions aren't required
- Early help, as outlined in Working Together to Safeguard Children, where statutory interventions aren't required. The DSL should know what this process is and where to access support
- Referrals to children's social care<sup>1</sup>, where a child has been harmed, is at risk of harm, or is in immediate danger
- Report to the police (usually in parallel with a referral to children's social care), where a report of rape, assault by penetration or sexual assault is made. The Police will consider what action to take to manage the assessed risk of harm, which could include the use of police or court bail

<sup>1</sup>Where scenarios involve working with children's social care, your school shouldn't wait for the outcome of an investigation before protecting the victim and other children – the DSL (or a deputy) should work closely with children's social care to make sure the school's actions don't jeopardise a statutory investigation. There should be immediate consideration for safeguarding the victim, alleged perpetrator(s) and all other children.

Where a report is going to be made to children's social care and/or the police, the school should speak to the relevant agency to discuss next steps and how the alleged perpetrator(s) will be informed.

**E. Record and review your response report regularly**

Record all concerns, discussions and decisions made, along with the reasons behind them, in writing. Reflect on the decisions and actions taken and update relevant policies with lessons learnt. Look out for potential patterns of concerning, problematic or inappropriate behaviour. Decide how to handle any such patterns, considering whether there are wider issues at play relating to school's culture.



### 8.9.3 Creating a Supportive Environment and Minimising the Risk of CoC Abuse

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

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - 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 child-on-child 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
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action. Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

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



#### 8.9.4 Sharing of Nudes & Semi-Nudes (Sexting)

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately. You must **not**:

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

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

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

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

If none of the above apply then the DSL, in consultation with 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.



### 8.9.6 Sharing of Nudes or Semi-Nudes 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.

### 8.9.7 Sharing of Nudes or Semi-Nudes 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.

### 8.9.8 Sharing of Nudes or Semi-Nudes Referring to the Police

If it is necessary to refer an incident to the police, this will be done through 101 or 999

### 8.9.9 Sharing of Nudes or Semi-Nudes Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

#### 8.9.9.1 Sharing of Nudes or Semi-Nudes Curriculum coverage

In UKS2 pupils are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

- 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
- 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

#### 8.9.9.2 Reporting Systems for Pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations. To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

We have a number of systems in school for pupils to report concerns, including:

- Worry boxes in every class and central area
- Weekly Wellbeing assembly with a focus on keeping safe
- Posters around school identifying who pupils can speak to
- Termly safeguarding surveys in every class, and analysis of results
- Morning emotion check-ins
- Full-time learning mentor, wellbeing manager and nurture practitioner based in school
- Access to TADs support on a weekly basis



We recognise that children may disclose abuse in one or more of several different methods, each of which is likely to be very difficult for them and so when working with children, it is important to know how to support a child through what is likely to be a distressing time through recognising different forms of disclosure:

- Direct disclosure: this is a specific statement made by a child about the abuse that is happening to them
- Indirect disclosure: one or more ambiguous statements, which imply that something is wrong.
- Behavioural disclosure: deliberate or inadvertent behaviour that indicates that something is wrong
- Non-verbal disclosure: writing letters, drawing pictures or trying to communicate through another medium

## 9. Online Safety & Mobile Technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, our school aims to:

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

### 9.1 Four Categories of Risk

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

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

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

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



- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

## 10. Notifying Parents & Carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent. The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

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

## 11. Pupils with Additional Needs

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. This includes, but is not limited to:



- Using a Pictorial Exchange Communication System (PECs) for non-verbal pupils
- Offering bespoke Nurture & TEACCH provision to enables these pupils to feel safe, and comfortable with key members of staff
- Regular 1:1 sessions with the learning mentor and social stores

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

## 12. Pupils With a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

## 13. Looked-After Children and PLAC

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Jonathan Bean, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#). The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role. As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## 14. Complaints & Concerns About School Safeguarding Policies

### 14.1 Complaints Against Staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

### 14.2 Other Complaints

Please see the Waterton Academy Trust Complaints Policy.

### 14.3 Whistle-Blowing

Please see the Waterton Academy Trust Whistle-Blowing Policy.





## 15. Record Keeping

We will hold records in line with our records retention schedule. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school. Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. All records in school are kept digitally on the CPOMS system. All staff who have access to CPOMS do so via two-factor authentication and unique, timed access codes. In addition:

- The appendix sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- The appendix sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 16. Training

### 16.1 All Staff

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

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils
  -

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings). Volunteers will receive appropriate training, if applicable.



### 16.2 The DSL & DDSLs

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

### 16.3 Academy Standards Committee

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

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

### 16.4 Recruitment

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

### 16.5 Staff Who Have Contact With Families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## 17. Monitoring Arrangements

This policy will be reviewed **annually** by Tracy Phillips, Jonathan Bean & Michelle Foster. At every review, it will be approved by the full governing board.



## Appendix 1. Types of Abuse

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

### A1.1 Physical Abuse

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

### A1.2 Emotional Abuse

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

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

### A1.3 Sexual Abuse

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### A1.4 Neglect

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

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

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



### A1.5 Sexting & Sharing of Indecent Images

“Sexting” is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet. Young people may also call it cybersex or send a “nude” picture or selfie of themselves partially clothed. At Churchfield Primary School we will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos a safeguarding concern. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour. Staff will also be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

### A1.6 Teenage Relationship Abuse

TRA can be emotional, physical, sexual or financial abuse, where teenagers are isolated from their friends, being controlled with what they wear, checking up on them all the time, being forced to have sex, being forced to watch pornography against their will, forcing others to buy them things.

### A1.7 Female Genital Mutilation (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.

### **A1.8 Breast-Ironing**

Breast-ironing refers to the practice of massaging or pounding young girls' breasts with heated objects to suppress or reverse the growth of breasts. Breast ironing is often performed by mothers or female relatives of victims misguidedly wishing to protect their young relatives from rape, unwanted sexual advances, early sex, and pregnancies, all of which they fear would result from the appearance that a girl has reached the age of puberty.

### **A1.9 Cyberbullying**

This can be done via text messages or the internet (social media sites) and is usually prejudged against particular groups. It can result in the intimidation of a person through the threat of violence or by isolating them either physically or on-line.

#### **A1.9.1 Domestic Abuse & Violence**

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 (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children. 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. Children who witness domestic abuse are also victims. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn. 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. This is the procedure where police forces are part of [Operation Encompass](#). The DSL will provide support according to the child's needs and update records about their circumstances.

#### **A.1.9.2 Faith Abuse**

This includes belief in concepts such as witchcraft and spirit possession, demons or the devil, acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eyes or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children making them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

#### **A1.9.3 Honour-Based Abuse/Violence**

'Honor-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies,



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

#### **A1.9.4 Controlling or Coercive Behaviour**

Coercive control is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. This controlling behaviour is designed to make a person dependent by isolating them from support, exploiting them, depriving them of independence and regulating their everyday behaviour.

#### **A1.9.5 Child-on-Child Abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two. Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening. Child-on-child 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 children (this is sometimes known as 'teenage relationship abuse')
- 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 nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, 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. When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

#### **A1.9.6 Upskirting**

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

#### **A1.9.7 Child Sexual Exploitation (CSE)**

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.

### A1.9.8 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

### A.1.9.9 Radicalisation

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

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area,



in collaboration with our local safeguarding partners and local police force. We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour. The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

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

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

#### **A1.9.9.1 Forced Marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 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

#### **A1.9.9.2 Gangs & Youth Violence**

"Street gangs" for whom crime and violence are a core part of their identity, although "delinquent peer groups" can also lead to increased antisocial behaviour and youth offending. Although some group gatherings can lead to increased antisocial behaviour, it should not be confused with the serious violence of a gang culture/activity. 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.

#### **A1.9.9.3 Private Fostering**

A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 by someone other than a parent or close relative with the intention that it should last for 28 days or more.

#### **A1.9.9.4 Trafficking**

"Trafficking of persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. This could be the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.



## Appendix 2. Other Safeguarding Issues Impacting Children

There are a host of other issues that may have an indirect impact on safeguarding children that all staff should be aware of.

### A2.1 Children and the Court System

Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### A2.2 Children Missing From Education

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.

### A2.3 Children with Family Members in Prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### A2.4 Homelessness & Poverty

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



### A2.5 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.

### A2.6 Checking the Identity & Suitability of Visitors

All visitors will be required to verify their identity to the satisfaction of staff, and sign in using the electronic signing-in device. 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. All visitors must wear a badge in school, as well as their printed ID badge (badges have different colours depending on the type of visitor). 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 (if this is provided, we will not ask to see the DBS certificate)

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

### A2.7 Sexual Violence & Sexual Harassment Between Children

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, in all likelihood, 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report. When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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



## Appendix 3. Safer Recruitment

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. All recruitment processes are managed centrally by Waterton Academy Trust.

### A3.1 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

### A3.2 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

### A3.3 Shortlisting

Our shortlisting process will involve at least 3 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 have the opportunity to 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

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

### A3.4 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

### A3.5 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

### A3.6 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.

### A3.7 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. These could include, where available:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- 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

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our



assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### A3.8 Regulated Activity

**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

### A3.9 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

#### A3.9.1 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.

#### A3.9.2 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 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. For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.



### A3.9.3 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. In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### A3.9.4 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
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### A3.9.5 Governors & Trust Members

All governors and trust members 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 trust 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

### A3.9.6 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.





## Appendix 4. Allegations of Abuse Against Staff

### A4.1 Allegations Against Staff

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 they 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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO). 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, the chair of governors, or a member of trust staff. The CEO will be the case manager if 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. All accusations against staff will be carried out in partnership with Waterton HR.

### A4.2 Suspension Until a 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 come into contact with 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 Waterton Academy Trust

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

### A4.3 Definitions for Outcomes of Allegations Investigations

The following definitions relate to accusations made against staff:

- **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



#### A4.4 Procedures 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** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate (e.g union representation)
- 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.

#### **A4.5 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 taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

#### **A4.6 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.

#### **A4.7 Specific Actions Following a Criminal Investigation**

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

#### **A4.8 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

#### **4.9 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.



#### 4.9.1 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

#### 4.9.2 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

#### 4.9.3 Confidentiality & 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

#### 4.9.4 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.

#### 4.9.5 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

#### 4.9.6 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.

#### 4.9.7 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.

#### 4.9.8 Concerns that Do Not Meet The 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 above. Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- 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.

#### 4.9.9 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
- Humiliating pupils



#### 4.9.9.1 Sharing Low-Level Concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially 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
- 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
- Ensuring all staff have access to the Code of Conduct and the Staff Handbook
- Operating an open-door policy

#### 4.9.9.2 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 staff handbook & WAT Code of Conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

#### 4.9.9.3 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 this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at 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

#### 4.9.9.4 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

