



## Safeguarding and Child Protection Policy

<b>Approved by:</b>	Governing Board	<b>Date:</b> 19 <sup>th</sup> July 2023
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## Links with other policies

It should be noted that this policy does not stand alone but is written in conjunction with a number of other school policies/documents, amongst them are:

- ☐ Safeguarding policies
- ☐ Educational Visits policy
- ☐ Anti-bullying policy
- ☐ Professional Values and Behaviours policy
- ☐ SEND policy
- ☐ RSE policy
- ☐ CIAG policy

## 1. Aims

The school aims to ensure that:

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

## 2. Legislation and statutory guidance

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

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of students
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

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

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

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

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

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

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

**Nudes/Semi-nudes/Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

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

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

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

### 4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

### 5. Roles and responsibilities

Safeguarding, child protection and promoting the welfare of children are **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.

## 5.1 Names and contact details of people with specific responsibility for Safeguarding

• DSL	Jane Howarth	07732 692730
• Deputy DSL	Mark Ollerenshaw	07843 656658
• Deputy DSL	Rachel Appleyard	07846 652927
• Link Governor for Safeguarding	Yvonne Moir	01482 222299
• Name and contact details of the Chair of Governors	Richard Martin	01482 222299
• LADO East Riding of Yorkshire Council	Lorraine Wilson/Siobhan Bath	01482 396999
• LADO Hull City Council	Jackie Edhouse	07710 119092

## 5.2 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2023](#), and review this guidance at least annually.

All staff will be aware of:

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

Section 13 and appendix 4 of this policy outline in more detail how staff are supported to do this.

## 5.3 The Designated Safeguarding Lead (DSL)

The DSL is Jane Howarth. Jane is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. See 5.1 for contact details.

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

- Over-see the development and implementation of the Safeguarding policy (including filtering and monitoring)
- Report to the Governing Board Safeguarding Sub-committee half-termly on the implementation of safeguarding policy and incidents of a child protection nature
- Produce a written annual report for the Governing Body on the Child Protection/Safeguarding work of the school
- Maintain the school's safeguarding recording system, CPOMS
- Lead Safeguarding training for staff and governors, including termly safeguarding recaps and induction training
- Oversee the Single Central Record, ensuring it is updated and fully compliant

- Provide advice and support to 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 students
- 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
- Liaise with Senior Mental Health Leads and help promote educational outcomes for students affected by safeguarding and child protection issues

The DSL will also keep the Principal and Safeguarding Governor informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL are set out in her job description.

#### **5.4 The Deputy Designated Safeguarding Lead (DDSL)**

The DDSLs are Mark Ollerenshaw and Rachel Appleyard. Mark is the Vice-Principal.

See 5.1 for contact details.

The DDSLs will deputise for the DSL in her absence.

#### **5.5 The Designated Safeguarding Governor (DSG)**

The DSG is Yvonne Moir.

The DSG acts as a 'Champion' for Safeguarding within the school and liaises with the Principal and DSL in order to report to and advise the full Governing Body on the strategic and operational aspects of Safeguarding. The DSG is also the DMHG (Designated Governor for Mental Health)

The DSG will:

- Monitor the implementation of Safeguarding policy and procedures, reporting to the full Governing Board as necessary
- Ensure any identified weaknesses in the policy or application of the policy is remedied immediately
- Ensure a written annual report is presented to the Governing Board on the Child Protection/Safeguarding work of the school
- Ensure that this policy is revised and updated annually
- Chair the Governing Board Safeguarding Sub-committee, which meets half-termly
- Carry out regular scrutiny of the Single Central Record with the Principal and DSL
- Ensure all staff and members of the Governing Board receive Safeguarding training appropriate to their roles

N.B. Governors will not normally have access to details of individual Child Protection Cases.

#### **5.6 Governing Board**

The Governing Board will approve this policy at each review, ensure it complies with the law and hold the Principal to account for its implementation.

The Governing Board will appoint a DSG to monitor the effectiveness of this policy in conjunction with the full Governing Board.

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

All governors will read Keeping Children Safe in Education, Part 1 & Annex B and undergo annual safeguarding training.

Section 13 has information on how governors are supported to fulfil their role.

#### **5.7 The Principal**

The Principal 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
- Communicating this policy to parents 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 update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

## 6. Confidentiality

Timely information sharing is essential to effective Safeguarding

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

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 DSL (or DDSL)

Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3

## 7. Recognising abuse and taking action

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

N.B. In this and subsequent sections, you should take any references to the DSL to mean "the DSL (or DDSL)".

### 7.1 If a student is suffering or likely to suffer from harm, or in immediate danger

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

- Tell the DSL or DDSLs in person (see section 5.2) as soon as possible *and within an hour of you becoming aware of the concerns*
- If, in exceptional circumstances, the DSL and DDSLs are not available, refer the matter to the Vice Principals
- Enter the concerns into CPOMS as soon as possible and on the same day – alert only relevant staff

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

If a child is not suffering or likely to suffer from harm, or in immediate danger:

- Tell the DSL or DDSLs in person (see section 5.2) as soon as possible *and within an hour of you becoming aware of the concerns*

- If, in exceptional circumstances, the DSL and DDSs are not available, refer the matter to the Principal, Head of School or a Senior Member of Staff
- Enter the concerns into CPOMS as soon as possible and on the same day – alert only relevant staff

### 7.3 If a student makes a disclosure to you

If a student discloses a Safeguarding issue to you:

- Listen and accept the information being given as true. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Reassure the child that 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. Ensure confidentiality but **DO NOT** promise to keep it a secret
- Write up your conversation as soon as possible in the student's own words – **BE FACTUAL**. Do not make judgements
- Sign and date the write-up and pass it on by hand to the DSL or DDSs

If, in exceptional circumstances, the DSL and DDSs are not available, refer the matter to the Principal, Head of School or a Senior Member of Staff

- Enter the details onto CPOMS as soon as possible and on the same day – alert only relevant staff

### 7.4 If you discover that FGM has taken place or a student is at risk of FGM

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

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

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

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

They must also refer the case with the DSL who will involve children's social care as appropriate.

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

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

**Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow the school's Safeguarding procedures outlined in 7.1

**Staff must not examine students.**

### 7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger:

- Tell the DSL or DDSs in person (see section 5.2) as soon as possible *and within an hour of you becoming aware of the concerns*

- If, in exceptional circumstances, the DSL and DDSLs are not available, refer the matter to the Principal, Head of School or a Senior Member of Staff
- Enter the concerns into CPOMS as soon as possible and on the same day – alert only relevant staff

Where there is a concern, the DSL and Principal will consider the level of risk and decide upon any referrals. 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 student. 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

## 7.6 Early help

If early help is appropriate, the DSL will 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.

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.

## 7.7 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL or a DDSL will make the referral.

If, in exceptional circumstances the DSL and DDSLs are not available, the Principal or Head of School will make the referral.

The Local Authority procedure is as follows:

- LA receives a referral from the school or college
- LA reviews the case and decides the course of action – this should be within one working day of the initial referral
- LA informs the school/college of any further action to be taken

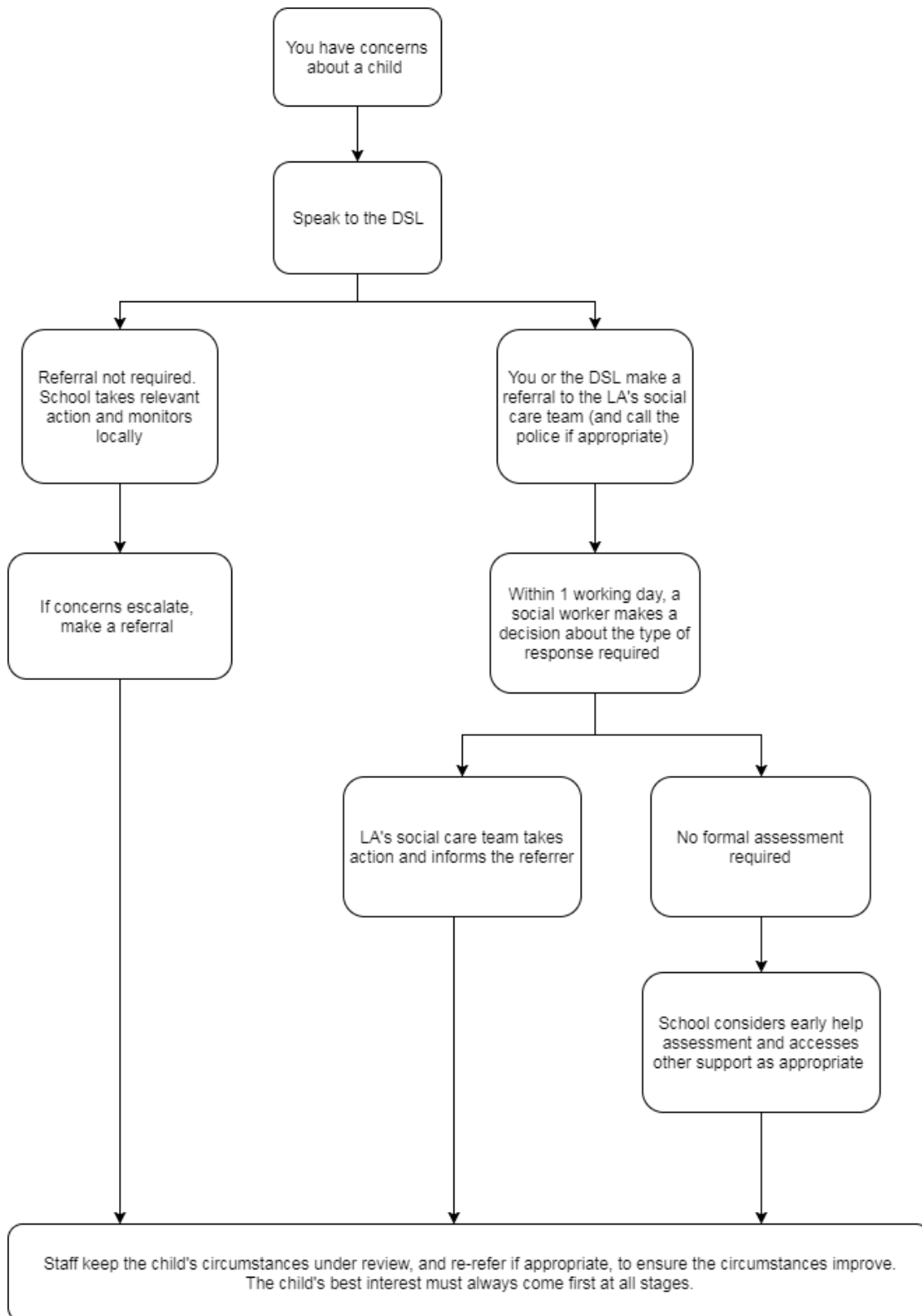
The DSL must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the student's situation does not seem to be improving after the referral, the DSL must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.



**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



The DSL will also make reference to **NPCC – When to call the police** in order to ascertain when calling the police should be considered and what to expect if this is the case.

## **7.6 Concerns about a staff member or volunteer**

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Principal immediately. If the concerns/allegations are about the Principal, speak to the Chair of Governors (contact details available on the website).

The Principal/Chair of Governors will then follow the procedures set out in appendix 3, if appropriate.

## **7.7 Allegations of abuse made against other students – child on child abuse**

We recognise that students 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”. RDUTC takes a zero- tolerance approach to this and even if there are no reported cases, we should not assume that child on child is not happening in school as it may just be that it is going unreported. We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys will be perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously. Child on child abuse can take place within intimate partner relationships.

Most cases of students hurting other students 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 students in the school at risk
- is violent (including initiation/hazing type violence and rituals)
- involves students being forced to use drugs, alcohol or other illegal substances
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, forcing someone to strip or touch themselves sexually or sexually inappropriate pictures or videos (including consensual and non-consensual sharing of nudes and semi-nude images)

If a student makes an allegation of abuse by or against another student:

- Reassure the victim/s that they are being taken seriously and that they will be supported and kept safe. Never give the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Do not say or do anything to make them feel ashamed for making a report.
- Tell the DSL or DDSs in person (see section 5.2) as soon as possible *and within an hour of you becoming aware of the concerns*
- If, in exceptional circumstances, the DSL and DDSs are not available, refer the matter to the Vice Principals
- Enter the concerns into CPOMS as soon as possible and on the same day -alert only relevant staff
- 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 and Principal 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 to whom they can talk if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

- challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images

- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially by promoting referral procedures in assemblies, during Induction and on posters displayed around the school
- Ensuring staff are trained to understand that a student harming another student could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

## 7.8 Sharing of nudes or semi-nude images/videos

### Your responsibilities when responding to an incident

If you are made aware of an incident involving the sharing of nudes or semi-nude images/videos (previously known as 'sexting' or 'youth produced sexual imagery'), you must:

- Explain to the student(s), if the disclosure has come from them, that you need to report the incident, and reassure them that they will receive support and help from the DSL
- Tell the DSL or DDSs in person (see section 5.2) as soon as possible *and within an hour of you becoming aware of the concerns*
- If, in exceptional circumstances, the DSL and DDSs are not available, refer the matter to the Vice Principals
- Enter the concerns into CPOMS as soon as possible and on the same day – alert only relevant staff

You must **not**:

- View, download or share the imagery yourself, or ask a student 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 student to delete it
- Ask the student(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 student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

### Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with the Principal. This meeting will consider the initial evidence and aim to determine:

- whether there is an immediate risk to student(s)
- if a referral needs to be made to the police and/or children's social care
- if it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- what further information is required to decide on the best response
- whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- whether immediate action should be taken to delete or remove images from devices or online services
- any relevant facts about the students 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 students involved (in most cases parents should be involved)

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

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

If none of the above apply then the DSL, in consultation with the Principal, may decide to respond to the incident without involving the police or children's social care.

#### **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.

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

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

#### **Informing parents**

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

#### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done by the Principal by dialling 101. The Principal and DSL will also refer to [NPCC – When to call the police](#).

#### **Recording incidents**

All incidents and the decisions made in responding to them will be recorded on CPOMS. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sharing nudes/semi-nude images or videos.

#### **Curriculum coverage**

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Employability & Personal Skills (incl. RSE) education and computing programmes. The curriculum plan covers the following in relation to the sharing of nudes/semi-nude images or videos:

- What the sharing of nudes is
- How the sharing of nudes 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

Students 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. Notifying parents**

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## **9. Students with special educational needs and disabilities**

We recognise that students with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

We offer extra pastoral support for students with SEND. See SEND policy and Care, Guidance and Support policy.

## **10. Mobile phones and cameras**

Staff and students are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time. Mobile phones may be used in lessons by students with the permission of the teacher. Staff may only use mobile phones in lessons under exceptional circumstances e.g. to call for a Call Out or contact First Aid.

Staff will not take pictures or recordings of students on their personal phones or cameras.

Students will not take pictures or recordings of staff on their personal phones or cameras.

Students may take pictures or recordings of other students for curriculum reasons, but only with the consent of both the students and the teacher.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

We recognise that young people may have unrestricted access to the internet via their mobile phones and any inappropriate online behaviour carried out at school will be dealt with according to the Safeguarding, E-Safety and Professional Values & Behaviour policies.

## **11. Complaints and concerns about school Safeguarding policies**

### **11.1 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 (see appendix 3).

### **11.2 Other complaints**

See Complaints policy

### **11.3 Whistle-blowing**

See Whistleblowing policy

## **12. Record-keeping**

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

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

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

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

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

Safeguarding records are held digitally on CPOMs. Access is limited to the DSL, DDSLs and Principal.

Any paper records are held securely in a locked container within a locked office.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## **13. Training**

### **13.1 All staff**

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

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

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

Contractors who are provided through Service Level Agreements or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

### **13.2 The DSL and 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.

### **13.3 Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

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

The safeguarding Governor receives training including Prevent and Safer Recruitment.

### **13.4 Recruitment – interview panels**

At least one person conducting any interview for a post at the school will have undertaken Safer Recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 5 for more details.

## 14. Monitoring arrangements

This policy will be reviewed **annually** by DSL, Principal and the Governing Board Safeguarding Sub-committee. At every review, it will be approved by the full Governing Board.

## 15. Links with other policies

This policy links to the following policies and procedures:

- Professional values and Behaviours
- Staff Code of Conduct
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Relationship and Sex Education
- Curriculum
- Privacy notices
- Transgender policy

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.**

## Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, forcing someone to strip or grooming a child in preparation for abuse (including via the internet)

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

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

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

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

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

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

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

### New staff

When appointing new staff, we will:

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

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

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or



- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

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

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

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

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

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

### **Contractors**

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

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

We will obtain the DBS check for self-employed contractors. We will not keep a copy of the DBS certificate but will record the certificate number and the name of the staff member who checked the certificate.

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

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

### **Trainee/student teachers**

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

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

### **Volunteers**

We will:

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

### **Governors**

All governors and 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 board will have their DBS check countersigned by the secretary of state.  
All governors and members will also have the following checks:

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

All 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](#))

### **Staff working in alternative provision settings**

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

### **Adults who supervise students on work experience**

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

No student under the age of 16 will have work experience placements.

## **Appendix 3: allegations of abuse made against staff (incl. Supply staff, volunteers and visitors to the school site)**

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

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

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

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

### **Suspension**

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

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

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal (or Chair of Governors where the Principal is the subject of the allegation) will be the 'case manager' and will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

Where the police are involved, wherever possible the Governing Board 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.

## Timescales

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

## **Specific actions**

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

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

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

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

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

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

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

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

### **Unsubstantiated or malicious allegations**

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

## **Confidentiality**

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

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

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

## **Record-keeping**

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

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

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

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

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

## References

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

## Learning lessons

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

This will include consideration of (as applicable):

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

## Low-level concerns

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold for an allegation.

'Keeping Children Safe in Education' defines a low-level concern as:

"any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college 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 LADO"

## Avoiding low-level concerning behaviour

Behaviour defined as a 'low-level concern' can exist on a spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but is not in specific circumstances, through to that which is ultimately intended to enable abuse.

Staff education and reinforcement on avoiding circumstances which may put them in a difficult situation is key to avoiding the need for dealing with these types of concerns.

Our school ensures that staff are clear about what appropriate behaviour is through their induction and regularly reinforcement of documents such as:

- Staff Code of Conduct
- 'Avoiding Allegations' guidance
- Safeguarding and Child Protection policies and regular training
- Teachers' Standards (for teaching staff)

## Reporting a low-level concern

Low-level concerns about a member of staff should be reported to the DSL and/or Principal as per the College's Child Protection procedures. If the concern is about the Principal this should be reported to the Chair of Governors.

Low-level concerns about supply staff, contractors and local authority visiting staff will also be reported to their employers.

### **Dealing with a low-level concern**

Where a concern is raised about the practice or behaviour of a member of staff, this information must be recorded and passed to the Principal.

The Principal must then make an assessment to determine if the matter is a 'low-level concern' or an 'allegation' and follow one of the following routes.

- Allegations that meet the harm threshold will be referred to the LADO for advice.
- Low-level concerns that the College feel may need further guidance on will be referred to the LADO for advice.
- Low-level concerns that the College feel they can deal with internally will be dealt with via the College's usual child protection investigation process.

The College will engage with its HR provider where it is necessary to undertake further investigation and/or deal with the concern under relevant processes.

### **Recording a low-level concern**

All low-level concerns should be formally recorded by a member of staff when they are made aware of them. This record should then be passed to the Principal (or Chair of Governors if the concern is about the Principal).

- Details of the concern.
- The context in which the concern arose.
- The outcome of the investigation and any action taken, and
- The name of the individual sharing their concerns (if known) (unless the individual wishes to remain anonymous which must be respected as far as possible).

Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low-level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles.

### **Reviewing a low-level concern**

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the Principal will decide on a course of action, which may include:

- Disciplinary investigation and/or proceedings
- Management Advice, including recommendations for training
- Referral to the LADO (where a pattern of behaviour moves from a concern to meeting the harm threshold).

The College will take advice, where appropriate, from their HR provider in respect of low-level concerns.

The College will also review appropriate policies and training, or other wider cultural issues in the College, to see whether anything needs to be done to minimise the risk of similar behaviour happening again.

Relevant records will be retained confidentially on the personnel file. A separate record will also be kept of low-level concerns to more easily identify patterns that may involve more than one member of staff. All records must be kept in line with data protection principles.

Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be

referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

## **Appendix 4: specific safeguarding issues**

### **Children absent from/missing from education**

A child with frequent/prolonged absence and/or 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 be frequently absent or 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 have frequent/prolonged absence and/or 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. The Attendance Officer works closely with the DSL & DDSLs, including daily contact and twice-weekly meetings which also include the Principal.

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

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

### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol; • children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

## **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs 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.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). 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.

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.

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.

Indicators of sexual exploitation can include the CCE indicators listed above and:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

## **Mental Health**

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a member of the pastoral team.

## **County lines**



County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can 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.

If a child is suspected to be at risk of or involved in county lines, then refer this to the DSL, DDSL or other senior member of staff using CPOMS the school’s other safeguarding procedures.

## **Homelessness**

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

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

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

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

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

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

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

## **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of 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 student is at risk of FGM.

Indicators that FGM has already occurred include:

- a student confiding in a professional that FGM has taken place
- a mother/family member disclosing that FGM has been carried out
- a family/student 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 student may be at risk of FGM include:

- the girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced 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 stating that they or a relative will take the girl out of the country for a prolonged period
  - requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - being unexpectedly absent from school
  - having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. **Any form of marriage for someone under the age of 18 is illegal, even where violence, threats or another form of coercion is not used.** Any reports or suspicion of marriage of someone under the age of 18 should be reported to the DSL/DSLs immediately using the school's safeguarding procedures.

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

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

The DSL will:

- speak to the student 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 [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk)
- refer the student to an education welfare officer, pastoral manager or counsellor, as appropriate

### **Preventing radicalisation**

• **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

• **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

• **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 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 radicalisation. All staff and the safeguarding Governor will undertake Prevent awareness training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into radicalisation. 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 students 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 students' behaviour.

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

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

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

If staff are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL who may make a Prevent/Channel referral. Any referrals made will be subject to parental and individual consent.

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

## Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

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

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

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

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

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

## Missing students

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

- notify parents/carers as soon as possible
- contact the police if we suspect the student is at risk of harm or we are unable to contact parents/carers
- attempt to contact the student to establish his/her whereabouts via his/her mobile or with the help of friends via mobiles/social media

## Knife crime

Knife crime is on the rise nationally and this includes our locality. Our procedures help to ensure that we work together to identify and support students who may be at risk of knife crime; making reference to the relevant recommendations in [Safeguarding Children and Young People in Education from Knife Crime, March 2019](#).

## Upskirting

KCSiE 2020 describes this as: "Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to gain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. Anyone of any gender, can be a victim." As such, the school will treat any actions of this nature as a serious incident and will follow the advice of the police and EHASH.

## Domestic Abuse and IPV (Intimate Partner Violence)

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships.

This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures will be followed and both young victims and young perpetrators will be offered support.

Where the school has been made aware that a student has been affected by domestic abuse, they will be monitored and supported where appropriate. This will always be done sensitively and confidentially.

## Appendix 5: Safeguarding Training programme

All staff at RDUTC have safeguarding and child protection training at induction and have updates at least annually. This includes; the DSL, DDSLs, Principal & Senior staff, teaching staff, support staff, governors and volunteers.

### Contents

1. [All staff](#)
2. [The DSL](#)
3. [Principals](#)
4. [Governors and trustees](#)
5. [Volunteers](#)
6. [Safer recruitment](#)

### All staff

#### All staff undergo safeguarding and child protection training at induction

This training:

- Includes online safety
- Is integrated, aligned and considered as part of the whole school safeguarding approach, and wider staff training and curriculum planning
- Is updated regularly
- Is in line with advice from the 3 local safeguarding partners (the LA, the Integrated Care Board - previously the clinical commissioning group - for an area in the LA, and the chief officer of police for an area in the LA)
- Has regard to the [Teachers' Standards](#), with the expectation that teachers manage behaviour effectively to ensure a safe educational environment and have a clear understanding of the needs of all pupils
- Gives staff an awareness of the school's safeguarding systems, including:
  - The safeguarding policy
  - The behaviour policy
  - The safeguarding response to children who are absent from education
  - The staff behaviour policy/code of conduct
  - The role and identity of the designated safeguarding lead (DSL) and any deputies
  - The whistle-blowing procedure

Staff are given copies of above policies at induction and are asked to re-read them at least annually.

In addition, all staff are made aware of their role in identifying and dealing with safeguarding issues, including being aware of:

- The local early help process and understand their role in it
- The process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989
- What to do if a child tells them they're being abused, exploited or neglected
- The appropriate level of confidentiality required when a child tells them about abuse
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- That children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- The types of pupils who are at higher risk and would benefit from early help.
- The different kinds of safeguarding issues that can put pupils at risk of harm, and the signs to look out for

These issues include:

- Abuse and neglect
- Serious violence
- Mental health problems
- Female genital mutilation (FGM)
- Domestic abuse
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Child-on-child abuse

All staff read at least part 1 of the most up to date version of [Keeping Children Safe in Education](#) (KCSIE).

Staff at RDUTC also read Annex B and Parts 4 & 5

Staff members are regularly updated on child protection and safeguarding issues throughout the school year and at least annually.

Staff may be updated via email, e-bulletins and staff meetings., as well as more formal, online training.

### **Prevent duty training.**

All staff have Prevent training, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

### **The DSL**

DSL/DDSL training is updated at least **every 2 years**. Additional knowledge and skills are updated at regular intervals, and at least annually.

DSL training enables the DSL/DDSLs:

- Understand the assessment process for providing early help and intervention, for example, the local criteria for referral arrangements
- Have a working knowledge of how the LA conducts child protection case conferences and child protection review conferences, and attend and contribute to these effectively when required
- Understand the importance of the role the DSL has in providing information and support in order to safeguard and promote the welfare of children
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this to promote educational outcomes
- Be alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- Understand the importance of information sharing, both within our school, and with the 3 safeguarding partners and other agencies, organisations and practitioners
- Be able to keep detailed, accurate and secure written records of concerns and referrals
- Understand and support the school with regards to the requirements of the Prevent duty, and be able to provide advice and support to staff on protecting children from the risk of radicalisation
- Understand the unique risks associated with online safety, and be confident with the knowledge and capability to keep children safe while online at school
- Recognise the additional risks that children with SEND face online, and be confident you have the capability to support SEND children to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them
- Have a good understanding of harmful sexual behaviour (HSB)

## **The Principal**

The Principal ensures that she is aware of key issues and is equipped to discuss issues with the DSL if needed.

The Vice-Principal is a DDSL and is trained to the same level as the DSL.

The Principal is trained in managing [allegations against staff](#) as she will usually be the case manager if an allegation is made so needs to be confident in how to handle this.

The Principal is also trained on:

- [Safer recruitment](#)
- Equal opportunities, and schools' responsibilities under the [Equality Act 2010](#)

## **Governors and trustees**

Governors undergo safeguarding training, including online safety, at induction, which is regularly updated.

The Chair of governors also has training on safer recruitment and handling allegations against staff, as they will be the case manager in the event of an allegation against the Principal or principal.

## **Volunteers**

Volunteers and temporary staff undergo a safeguarding briefing at induction.

## **Safer recruitment**

**At least 1** of the people conducting an interview has done safer recruitment training.

This training is reviewed every **2 or 3 years**.

# **Appendix 6: Filtering and Monitoring systems**

The DSL is responsible for overseeing the implementation of filtering and monitoring systems, in conjunction with the Operations Manager.

## **Filtering & Monitoring**

Students have specific CIPA compliant filtering policies that are applied at every level. Within these levels, various categories / sites / apps that are either whitelisted or blacklisted so that whilst on the school network they cannot access content that is deemed inappropriate to them. Filtering outside the normal level eg Social Media Access is agreed at SLT level and removed once no longer needed.

All filtering policies are externally updated 24/7 to ensure sites are categorised correctly.

## **Wifi**

RDUTC does not offer student access to the internet unless it through a secure school supplied device.

## **Safeguarding Alerts & Reporting**

Websites and keyword searches entered into Bing, Google, Youtube etc are monitored. Suspicious searches or searches deemed inappropriate are flagged with an automated alert emails sent to the relevant pastoral team along with a dedicated Microsoft Team for central viewing.

The reporting system uses a continuously updated keyword database enabling it to flag suspicious activity related to suicide and self-harm, extremism and radicalization, racism, drugs, pornography, and profanity.