

## SOUTHLANDS HIGH SCHOOL

## Child Protection and Safeguarding Policy 2023/24

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Signature of Headteacher:	Signature of Chair of Local Governing Body:
P. R. Banfild	Christing

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#### **IMPORTANT CONTACTS**

Designated Safeguarding Lead:

Designated Deputy Safeguarding Lead: Deputy DSL

Mrs. L Hardman

Mrs. A Forshaw

#### Welfare Team

Mrs. F McGladrigan Assistant Headteacher / SENCO

Miss M Miller Student and Family Support Worker

Miss S Gage Assistant Headteacher

Mrs. Rennie Head of Year 7

Miss Tomlinson Year 7 Manager

Miss Rowan Year 8 Manager

Miss Livesey Year 9 Manager

Miss Wiggans Year 10 Manager

Mr. Callow Head of Year 11

Mrs. Ibbison and Miss Litherland Pastoral Support Assistants

Mrs. Lang Welfare Officer

Ms. Neill Attendance Improvement Officer

Designated Teacher of LAC: Designated Senior Leader of Mental Health: Mrs. L Hardman Mrs. L Hardman

#### 1. AIMS OF THE POLICY

To provide all staff and governors with the necessary information to enable them to meet their child protection responsibilities and secure the welfare of Students.

To ensure consistent good practice in accordance with current legislation.

To use the policy as a working document and source of information when dealing with child protection and or welfare issues, and for promoting the welfare of Students.

To demonstrate the school's commitment with regard to safeguarding the welfare of Students and protecting them from harm.

#### 2. LEGISLATION AND STATUTORY GUIDANCE

This document is one of a series in the school's integrated safeguarding portfolio which explains how this school, Southland's High School (SHS), safeguards and promotes the welfare of children. This policy also includes guidance and procedures.

This document should also be read in conjunction with the following Southlands' policies

- Attendance policy (which includes procedures for a child missing in education)
- Behaviour policy (which includes the use reasonable force and searches)
- Mosaic Trust Child Protection Statement of Intent
- Relationship Sex and Health Education Policy
- SEND policy
- LAC Policy
- Anti-Bullying Policy
- SHS Safeguarding and Welfare Handbook\*
- Mosiac Learning Trust Whistleblowing Policy
- Staff Code of Conduct
- Exclusion Policy
- Data and E-Security Breach Prevention and Management Plan

\*The SHS Safeguarding and Welfare Handbook is an internal document outlining protocols and staff actions in detail.

These school arrangements fully support the Trust's policy, including its aims and ethos, which have been written in line with the statutory DfE guidance *'Keeping Children Safe in Education' (September 2023) and Working Together to Safeguard Children (July 2018),* the *Governance Handbook* and follow Lancashire's Children's Safeguarding Assurance Partnership (CSAP).

Section 175 of the Education Act 2002 and 2011 requires Local Authorities and governors of schools to make arrangements to ensure the safeguarding and promotion of the welfare of children. This policy sets out how Southlands will fulfil this function and has regard to the following safeguarding legislation and statutory guidance:

- The Children Act 1989 and 2004 amendment
- Section 175 of The Education Act 2002 and 2011
- Safeguarding Vulnerable Groups Act 2006
- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by Section 74 of the Serious Crime Act 2015)
- Keeping Children Safe in Education (2023)
- Working Together to Safeguard Children (2018)
- The Equality Act 201
- The Rehabilitation of Offender Act 1974

- The School Staffing (England) Regulations 2009
- Statutory Guidance on FGM
- Statutory Guidance on The Prevent Duty
- The Human Rights Act 1998
- Public Sector Equality Duty (PSED)

#### 3. WHO THIS POLICY APPLIES TO

The policy applies to the whole school community, including the Headteacher, governors, teaching staff, nonteaching staff, volunteers and temporary staff. Students and parents are also made aware of the arrangements set out in the policy, which is available on the school's website.

#### 4. PRINCIPLES AND VALUES

We believe that the welfare of all Students is paramount, and we endeavour to provide a safe and welcoming environment where children are respected and valued, and where their physical and mental health and wellbeing is secured.

We believe that safeguarding and promoting the welfare of all children is everyone's responsibility.

Wherever possible we seek to identify needs early, and work with parents and carers to prevent escalation of need into crises.

We believe in treating all Students equally, and that they have the right to protection from abuse without exception, regardless of gender, ethnicity, disability, sexuality or beliefs.

We believe in a child-centered and coordinated approach, working together with other agencies to ensure Students receive the best level of service to protect their safety and well-being. We act in the best interests of child. We support parents and carers as much as possible without compromising the safety and wellbeing of the child.

We believe in doing our best to provide the right help for Students and families at an early stage to prevent the risk of harm to Students in the future.

The voice of the child is vital and must be sought when considering their needs.

We believe in British values and applying those to daily school life.

We are fully committed to safeguarding the welfare of looked after children, previously looked after children and care leavers.

#### 5. TERMINOLOGY

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.

**Safeguarding means**: protecting **children** from abuse and maltreatment; preventing harm to children's mental and physical health or development; ensuring **children** grow up with the provision of safe and effective care.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or at risk of suffering significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.

**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.

**Staff** refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

#### Students or Child / Children includes anyone 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)
- > Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- > The chief officer of police for a police area in the LA area

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

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

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers, legal guardians and adoptive parents.

#### 6. 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 or health conditions
- > 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
- > Students who may have a social worker
- > Students who may have experienced adversity or trauma
- > Are looked after or previously looked after
- > Are missing from education for prolonged periods and/or repeat occasions
- > Whose parent/carer has expressed an intention to remove them from school to be home educated

#### 7. ROLES AND RESPONSABILITIES

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- > Behaviour policy
- > Pastoral support system
- > Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships

- o Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

#### **Designated Safeguarding Lead**

The Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online. She works with the local authority and other agencies in line with Working Together to Safeguard Children 2018.

The DSL and deputies receive updated training every two years and attend local authority briefings and conferences whenever possible. The DSL and Deputies receive bulletins from CSAP together with regular supervision throughout the year. The role of the DSL and deputies is outlined in Southland's Safeguarding and Welfare Handbook.

During term time the Designated Safeguarding Lead (or a deputy) is always available (during school hours) for staff in the school to discuss any safeguarding concerns. Preferably this is face-face but if there is an occasion where it is not possible to meet with the DSL or deputies then see another member of the named Welfare team, SLT or phone through to the Contact Centre and make a referral. The Lancashire Safeguarding Team can be contacted on **0300 123 6720** or **0300 123 6722 out of hours**.

The DSL and Deputy will have a good understanding of safeguarding concerns including harmful sexualised behaviour. The school's response to managing cases of sexual violence and harassment will be in line with procedures followed by the police and local authority children's social care.

The full responsibilities of the DSL and deputy are set out in their job description and the SHS Safeguarding & Welfare Handbook.

#### The role of the Governing Body

The governing body should ensure that:

- There is a named DSL for child protection who is a member of the Senior Leadership Team and who has undertaken training in interagency working, in addition to child protection training appropriate for DSLs.
- There is a named governor linked to CP, Safeguarding and Prevent.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Evaluate and approve this policy at each review, ensuring it complies with the law and hold the headteacher to account for its implementation.
- The DSL has appropriate authority to discharge duties, and is given the time, funding, training and support to provide advice and support to other staff, including time to contribute to strategy discussions, interagency meetings and assessments of children.
- Child protection policy and procedures are in place and are consistent with MSP requirements, reviewed annually and made available to parents on request.
- The DSL liaises with the Local Authority and contributes to interagency working in line with statutory guidance *Working Together to Safeguard Children 2018.*
- There are procedures for dealing with allegations of abuse against members of staff including allegations made against the Headteacher, namely the governors, to liaise with LA and /or other agencies.
- Staff always act in the interest of the students and that staff do not promise confidentiality.

- Safer recruitment procedures include requirement for appropriate checks and evidence including: DBS checks, barred list checks and prohibition checks together with references and interview information.
- Procedures for handling allegations against staff and volunteers are in place.
- Procedures are in place to handle allegations against other students.
- The students' wishes are taken in to account when determining what action to take and what services to provide for them, by ensuring that systems are in place for students to express their views.
- All staff, including the Headteacher, receive annual child protection training, which is updated regularly in line with advice from the local authority, and that the DSL receives refresher training at two yearly intervals.
- All temporary, supply staff and volunteers are made aware of the school's arrangements for child protection.
- The curriculum provides teaching on safeguarding issues and ensures this is delivered in an effective way.
- There is a designated teacher responsible for children who are looked after (LAC) and previously LAC to ensure that procedures are in place for ensuring those students' safety.
- Appropriate responses are provided for children who go missing from education settings, particularly on repeat occasions, to help identify risk of abuse and neglect, including child sexual exploitation and to help prevent risks of their going missing in future.

All governors will read KCSIE in its entirety.

#### The role of the Headteacher

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

- The child protection policy and procedures are implemented and followed by all staff.
- Sufficient time and resources are allocated to enable the DSL and Safeguarding Team to carry out their roles effectively, including the assessment of Students and the attendance at strategy discussions and other necessary meetings.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with whistleblowing procedures.
- Ensure that staff (including temporary staff) and volunteers: 1) Are informed of our systems which support safeguarding, including this policy, as part of their induction 2) Understand and follow the procedures included in this policy, particularly those concerning referrals of suspected abuse and neglect.
- Students' welfare and safety is addressed through the curriculum.
- This policy is communicated via the school website.
- Ensure that all staff undertake appropriate safeguarding and child protection training and updating the content of the training regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

#### Virtual school heads

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

#### All Staff

All staff will read and understand part 1 and those who work directly with children will read annex B of the Department for Education's statutory safeguarding guidance, <u>Keeping Children Safe in Education</u>, and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance. Reinforce the importance of online safety when communicating with parents and carers. This includes making parents aware of what we ask children to do online (e.g., sites they will be asked to visit and who they will be interacting with online). Staff will provide a safe space for students who are LGBT to speak out and share their concerns.

#### 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 the behaviour policy, online safety which includes the expectations, applicable roles, and responsibilities in relation to filtering and monitoring and the safeguarding response to children who go missing from education.
- Their responsibilities to ensure the safety of students and promote their welfare and provide a safe environment in which students can learn.
- Of the role they play in identifying concerns early, sharing information and taking prompt action to avoid escalation of concerns.
- What to do if a child tells them they are being abused or neglected, including on specific issues such as Child on Child abuse and FGM.
- The need to attend regular training and read the policy and other updates, such as e-bulletins when they are issued, making themselves fully familiar of all arrangements and knowledge of safeguarding issues.
- The school's procedures for raising concerns.
- The need to retain an appropriate level of confidentiality with regard to any CP or safeguarding matters, whilst liaising with the safeguarding team and/ or social care.
- The need to reassure victims that they are being taken seriously and that they will be supported and kept safe.
- They never promise a child they will not tell anyone about any concern disclosed to them.
- They conduct themselves in a professional and appropriate way, adhering to the expectations set out in the staff Code of Conduct and within this policy.
- The need to seek out the DSL or Deputy DSL (or a PSM if DSL/DDSL not available) if they have an urgent concern about the potential risk to a child. Staff should not send the child home without raising a concern face to face.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The fact that children can be at risk of harm inside and outside of their home.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT)can be targeted by other children.
- What to look for to identify children who need help or protection and the different signs of abuse across the different risk ranges.

#### 8. RECORDKEEPING, INFORMATION SHARING AND CONFIDENTIALITY

The DSL keeps an up to date and accurate record of all concerns raised by staff. Concerns are recorded on CPOMS which is a confidential and secure online reporting and record keeping software.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If

you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Chronologies and all associated documents are maintained on CPOMS and a hard copy is kept on students' child protection files which are stored securely at all times and away from the students' main files.

The child protection files, both hard copies and electronic, are confidential and are not accessible by students, parents or most staff. The Safeguarding and Welfare Team and the Headteacher are the only staff who have access to these records.

Records will be held in line with our records retention schedule.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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

The General Data Protection Regulation and Data Protection Act 2018. do not prevent, or limit, the sharing of information for the purposes of keeping children safe. At times, SHS shares information with other agencies, and this is done, timely, and in line with local safeguarding procedures.

All staff know that they have a duty to share any concerns they have about a child within a safeguarding context and should report them immediately to the DSL either in person initially (in the case of an immediate risk) or via CPOMs.

All staff will receive training on GDPR and will be expected to comply with the new rules and expectations (Information Sharing 2018). See the SHS Safeguarding and Welfare Handbook for further guidance, including '7 golden rules' information.

If the victim asks the school not to tell anyone about the sexual violence or sexual harassment:

There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies:

- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
  - Parents or carers should normally be informed (unless this would put the victim at greater risk)
  - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
  - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by
    penetration or sexual assault is made, this should be referred to the police. While the age of
    criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring
    to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- o Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims'

#### identities

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 deputy).

Students who leave Southlands to attend another school will have their records transferred within 5 days of the request made by the new school or college.

#### 9. RECOGNISING ABUSE AND TAKING ACTION

At Southlands we ensure that staff know the different kinds of abuse they should be alert to, and students are aware of the different kinds of abuse they could be subject to. We are aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

We ensure that staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments.

Staff have a responsibility to pass on any concerns they may have and if they are not happy with the action taken to raise such a concern with the DSL.

If staff continue to remain dissatisfied, then they should raise the concern with the Headteacher and refer to the Trust's Whistleblowing Policy (see website).

**Definition of abuse**: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

**Physical abuse**: a form of abuse which 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**: the persistent maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill- treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include noncontact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also involves sexual violence and sexual harassment between children.

**Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### Indicators of abuse include the following but are not exhaustive:

- Recurrent or multiple injuries or burns at one time
- Delayed presentation of or reporting of an injury
- Admission of excessive punishment from parents / carers
- Inconsistent or absent explanation from parents / carers
- Associated family factors such as substance misuse, mental health problems, and domestic violence and abuse
- Other associated features of concern e.g. signs of neglect such as inadequate supervision, poor clothing, hygiene and / or nutrition
- Significant or sudden behaviour change
- Poor attendance or truancy
- Unable to contact parents
- Is concerned for younger siblings or a parent / carer without explaining why
- Becomes secretive and reluctant to share information
- Talks of running away
- Is reluctant to get changed for sports or wears clothes to cover injuries etc.
- Fear of physical contact or flinching
- Continual self-deprecation or inability to accept praise
- Suicide attempts, self-harming or risk-taking behaviour
- · Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
- Medical problems such as chronic itching, pain in the genitals, sexually transmitted infections or pregnancy
- Eating disorders, depression, anxiety
- Being isolated or withdrawn
- Inability to concentrate and or decline in academic progress

Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong.

If a student shows a number of these symptoms, or any of them to a marked degree, you should record your concern using CPOMS.

# If a child is in immediate danger, suffering or likely to suffer harm, you must see the DSL / DSL immediately and write up your report later. In the unlikely event that the DSL / DDSL is absent you can see another member of SLT. If no staff are available, you must make a referral to the Lancashire Childrens services or MASH team via the numbers in this policy.

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

- **>** Listen to and believe them. Allow them time to talk freely and open up.
- > Stay calm and do not show that you are shocked or upset
- > Do not ask leading questions but reflect back what they have said in their own words for clarity.
- > Tell the child they have done the right thing in telling you.
- > Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- > Take the Students to the DSL / DDSL as soon as possible.
- > Write up your conversation on CPOMS as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.

### Do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process (DSL, Children's Services).

Bear in mind that some children may:

- > Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- > Not recognise their experiences as harmful
- > Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL, if you have concerns about a child.

#### Safeguarding Issues

All staff should have an awareness of the following safeguarding issues that can put children at risk of harm. We are also aware that some students may be more vulnerable to risk of harm than others including those who may have a SEND status, Looked After status or has a social worker.

#### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

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

#### Indicators of CCE can include a child (not exhaustive):

- > Appearing with unexplained gifts or new possessions
- > Associating with other young people involved in exploitation
- > Suffering from changes in emotional wellbeing
- > Misusing drugs and alcohol
- > Going missing for periods of time or regularly coming home late
- > Regularly missing school or education
- > Not taking part in education.
- > Persistent absence and parental worry
- > Change in friendship or relationships with older individuals or groups
- > Unexplained acquisition of money, phones and clothes
- > Excessive receipt of texts and calls
- > Relationships with controlling individuals/ groups
- > Leaving home without explanation
- Carrying weapons

**County Lines** is the police term for urban gangs supplying drugs to suburban areas, market and coastal towns using dedicated mobile phones and 'deal lines'. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Social media is a major form of initial contact with children.

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

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

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

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

#### Indicators of CSE

Signs of child sexual exploitation may include the child or young person:

- Going missing for periods of time or regularly returning home late
- Skipping school or being disruptive in class
- Appearing with unexplained gifts or possessions that can't be accounted for
- Experiencing health problems that may indicate a sexually transmitted infection
- Having mood swings and changes in temperament
- Using drugs and alcohol
- Displaying inappropriate sexualised behaviours, such as over familiarity with strangers, dressing in a sexualised manner or sending sexualised images by mobile phone (YPSI or sharing of nudes or semi-nudes).
- Showing signs of unexplained physical harm such as bruising and cigarette marks
- Having older boyfriends or girlfriend.
- Suffering from sexually transmitted infections or becoming pregnant
- Associating with other young people involved in exploitation

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

At SHS we provide prevention and intervention through assemblies, 1-1 mentoring with outside agencies, workshops and liaison with the local police, and information to parents. We are aware both CCE and CSE can occur both on and offline.

If you have a concern about a child in relation to CCE or CSE, report to the Safeguarding team immediately. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

#### Child-on-Child abuse

Safeguarding issues may manifest themselves via Child-on-Child abuse, which means that children may be harmed by other children or young people. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.

Southlands have a zero-tolerance approach to sexual violence and sexual harassment, and that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- > Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- > Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- > Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they must report it to the DSL / DDSL.

#### How we act upon a report of Child-on-Child abuse at SHS

We recognise that children can abuse other children. As a result, **staff should treat Child on Child abuse, sexual violence and sexual harassment between children as a safeguarding concern and refer to the Safeguarding team. Staff should never pass off inappropriate comments between peers as 'banter**'.

Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students. We also recognise the gendered nature of child-on-child abuse. However, all child-on- child abuse is unacceptable and will be taken seriously. We are mindful that abuse can happen in intimate personal relationships between children and is sometimes known as 'teenage relationship abuse'.

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

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

There will be occasions where a students' behaviour warrants a response under child protection rather than anti-bullying procedures. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. 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
- > Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

Sexual violence and sexual harassment can occur:

> Between 2 children of any age and sex

- > Through a group of children sexually assaulting or sexually harassing a single child or group of children
- > Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

#### When supporting victims of Child-on-Child Abuse, staff will:

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

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

Staff should be aware of the importance of:

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

#### If a student makes an allegation of abuse against another student, staff will:

> Record the allegation and tell the DSL, but do not investigate it

- > The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- > The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

We will ensure that:

- Any form of bullying by students is dealt with in accordance with our Behaviour and Anti- bullying policies.
- All victims are re-assured that their report will be taken seriously and that they will be supported and kept safe.
- The victim will never be made to feel ashamed for making a report.
- Child on Child abuse can be a one-off incident such as distributing an image around school. Such incidents will be dealt with seriously and may result in a referral to Children's Social Care or the police, depending on the incident.
- The wishes of the victim on how to proceed are taking into consideration
- When supporting victims, staff will reassure them that the law on child-on-child abuse is there to protect them, not criminalise them

- Parents of both parties are informed and support for the victim and alleged perpetrator/s put in place immediately.
- This could mean that victims and alleged perpetrators will be kept apart in classrooms and other shared spaces, and consideration will be given about travel to and from school. The emphasis is on ensuring that the victim can continue their normal routines.
- We consider the conduct of the alleged perpetrator as part of the school behaviour policy on the 'balance of probabilities' and apply appropriate and proportional consequences.

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

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

To achieve this, we will:

- > Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- > Be vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- > Ensure our curriculum helps to educate students about appropriate behaviour and consent
- > Ensure students are able to easily and confidently report abuse using our reporting systems both online and offline
- > Ensure staff reassure victims that they are being taken seriously
- > Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- > Ensure staff are trained to understand:
  - How to recognise the indicators and signs of Child-on-Child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of Child-on-Child abuse in school, it does not mean it is not happening staff should maintain an attitude of "it could happen here"
  - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a student harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing Child on Child abuse and responding where they believe a child may be at risk from it
  - o That they should speak to the DSL if they have any concerns
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as

taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, considering whether:

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

At SHS we make clear that:

- Sexual violence and harassment is never tolerated and not an inevitable part of growing up
- We will not accept sexual violence or harassment being 'played down' or dismissed as 'banter', 'having a laugh' or 'boys being boys'.
- We will not tolerate physical sexual gestures such as grabbing bottoms, breasts or genitals, or making sexually provocative comments.

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

#### Sharing of nudes and semi-nudes (sexting / YPSI)

Staff should be aware that incidents of YPSI being sent or received are becoming increasingly common and that when a student sends (distributes) such images they may be breaking the law and leaving themselves vulnerable to exploitation by third parties. In addition, there is increasing evidence that such activity may result in depression, self-harm and, in extreme cases, suicide. We take sexting very seriously and do not underestimate the harmful impact it may have on our students. In all such cases, SHS will follow *UKCCIS*, the UK Internet Safety (UKCIS) *Sexting in Schools and Colleges Guidance (2016)* and conduct a risk assessment to inform the appropriate response.

#### Your responsibilities when responding to an incident

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

You must **not**:

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

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

Refer to the DSL immediately and complete a CPOMS report. The device should be confiscated and made secure. Staff must not say anything to shame the student.

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

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

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

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

#### Further review by the DSL

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

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

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

#### Informing parents/carers

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

#### Referring to the police

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

#### **Recording incidents**

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

#### **Curriculum coverage**

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHCE Curriculum and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- > What it is
- > How it is most likely to be encountered

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

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

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

#### Serious Violence

Preventing violence in schools and colleges can require a mix of universal, targeted or specialist interventions. Many students at SHS live within a community that is subject serious violence and criminality, including knife crime.

At SHS we consider students to be at risk of being involved, whether by association or as victims, whether at the present time or in the future.

There are lots of reasons why young people feel the pressure to join gangs. They might be bored and looking for excitement or feel attracted to the status and power it can give them. They might join due to peer pressure, money or family problems. Gang membership can also make a child feel protected and that they belong.

Children and young people involved with, or on the edges of, gangs might be victims of violence or they might be pressured into doing things like stealing or carrying drugs or weapons. They might be abused, exploited or put into dangerous situations.

For lots of young people, being part of a gang makes them feel part of a family so they might not want to leave. Even if they do, leaving or attempting to leave can be a really scary idea. They might be frightened about what will happen to them, their friends or their family if they leave.

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

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

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

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

Staff are to be vigilant and report any concerns via the CPOMS system.

In the case of a students carrying weapons or banned items (refer to behaviour policy and safeguarding and welfare handbook), you must urgently refer to DSL or a member of SLT, who will arrange a search, will confiscate the item and inform the police.

In the case of emergency ring 999.

#### **Honour Based Abuse**

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.

FGM comprises of procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and is a form of child abuse. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. The Serious Crime Act 2015 places a statutory duty on **all** teachers to notify the police if FGM appears to have been carried out on a girl under the age of 18). Failure to report is likely to result in disciplinary sanctions.

#### Signs that FGM is about to happen or has already taken place

There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Indicators that FGM has already occurred include:

- > A pupil confiding in a professional that FGM has taken place
- > A mother/family member disclosing that FGM has been carried out
- > A family/pupil already being known to social services in relation to other safeguarding issues

> A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

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

#### What to do if you have concern

Tell the DSL immediately together with CPOMS referral. If you believe a girl is at immediate risk or is likely to have undergone FGM **you must personally report this to the Police via 101**. The DSL will support you to do this and will obtain a crime reference number, and notify the Contact Centre in line with MSP procedures. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Further guidance can be found in DfE, Multi- agency statutory guidance on FGM (April 2016), multi-agency guidance (April 2016).

#### Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

#### Indicators of forced marriage

Signs that a child or young person may be forced into marriage include:

- Absence and persistent absence.
- Request for extended leave of absence and failure to return from visits to country of origin.
- Fear about forthcoming school holidays.
- Surveillance by siblings or cousins at school.
- Decline in behaviour, engagement, performance or punctuality.
- Being withdrawn from school by those with parental responsibility.
- Not allowed to attend extra-curricular activities.

- Sudden announcement of engagement to a stranger.
- Prevented from going on to further/higher education.
- Anxious, depressed and emotionally withdrawn with low self-esteem.
- Girls presenting with cut/shaved hair for punishment or for 'dishonouring' the family.
- A report that a girl has been taken to a private practice to examine if she is a virgin.

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

The DSL will:

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

There may be occasions when a student does not return to education after a holiday, or they may stop attending school during term time. In these situations, staff may have a suspicion that forced marriage is an issue. If a member of staff suspects that a student has been removed from, or prevented from, attending education as a result of forced marriage, the DSL will refer to the Contact Centre and the police, together with a referral to the LA informing them that the student is missing from school.

#### **Mental Health**

Mental health is about our own feelings, thoughts and emotions. Each and every one of us has mental health and It is just as important to look after it as it is our physical health. At times we might need to talk to someone about what we are thinking and feeling so that our emotions don't become overwhelming. In some cases, poor mental health can be an indicator that a child is or at risk of suffering from abuse, neglect or exploitation. Staff at SHS are not mental health trained professionals but we are well placed to monitor 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.

#### Indicators of poor mental health include the following but are not exhaustive:

- Irritable
- Anxious
- Upset
- Low mood
- Angry
- Listless
- Directionless
- Self-harming which might include: cutting, scratching, marking, biting, punching
- Extreme highs followed by very low periods
- Obsessive behaviours
- Addiction
- School refusal
- Poor sleep habits
- Eating and diet concerns

#### What to do if you have a concern

Report any concerns about a Students through CPOMS to the welfare team. Further support including a possible referral to CAMHS will be offered to the students. In the case of self-harm, if a student has self-harmed in school, First-Aid must be sourced immediately followed by a referral to the welfare team. If the wounds are from historic harming (not fresh cuts), you must refer the information through CPOMS.

#### **Domestic abuse**

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

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

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

#### Indicators of domestic abuse

The following may be indicators that a child is living in an abusive environment:

- Taking part in dangerous or harmful behaviours
- Getting into trouble
- Are unhappy or worried
- Are angry and have violent outbursts
- Find it difficult to control emotions
- Have sleep difficulties
- Are afraid of getting hurt or are afraid of someone else getting hurt.

In most circumstances' children exposed to domestic abuse can be defined as Children in Need. Staff should refer to the DSL and record on CPOMS. The DSL will then make a referral to the Contact Centre for signposting to other services, or for Child in Need assistance. It may be sufficient to complete an Early Help Assessment to secure assistance from other agencies. A referral to MARAC may take place, which is a Multi- Agency Risk Assessment Conference where agencies share information on high risk cases of domestic violence and abuse and put in place a risk management plan.

#### **Children Who Are Absent From Education**

At SHS we are aware of the potential safeguarding concerns for students who go missing, such as child sexual exploitation, travelling to conflict zones, FGM and forced marriage. As such, attendance is recognised as an early indicator of potential safeguarding or child protection concerns. The SHS Attendance and Admissions policies, in line with Lancashire Authority procedures and Children Missing Education (CME) DfE statutory guidance 2016, and Education Regulations 2016 will be referred to and followed when a child is absent from school or is missing from education.

#### When a Child Misses Education at SHS we:

- Follow our procedures for unauthorised absence and CME.
- Treat it as a safeguarding concern and inform the LA of the details of students who fail to attend regularly, or on 11th consecutive day of absence have not returned to school after an agreed authorised or unauthorised absence. This is in order to prevent the child going missing from education.
- Make every attempt through reasonable enquiries to locate the students.

- Remove the Students from the admission register and notify the LA when, after failure to make reasonable enquiries, a
  student has not returned to school for twenty days after an authorised absence or is absent from school without
  authorisation for twenty consecutive school days and their destination is unknown, except if absence is due to illness, or
  unavoidable causes, or if the child has moved to another country or moved out of the area (reasonable distance).
- Arrange full-time education for excluded students from the sixth school day of a fixed period exclusion.
- Have a commitment to seek at least two emergency contacts for each family.

#### Homelessness

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

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

#### **Private Fostering**

Private Fostering is when a parent makes an arrangement for their child under 16 years old (or under 18 if disabled) to live with someone for 28 days or more by private arrangement (without the involvement of a local authority) with someone who is not a parent or a close relative. A close relative can be defined as a brother, sister, aunt, uncle, grandparent or step parent, guardian or a person with parental responsibility).Private foster carers might be friends of the child's family; someone willing to care for the child of a family they don't know; or relatives not mentioned in the list above, for example a cousin or great aunt.

At Southlands we recognise that privately fostered children and young people in Chorley, might be diverse and come from a variety of backgrounds and circumstances. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

#### What to do if a student is privately fostered

We have a mandatory duty to inform the Local Authority through Children's Services if we become aware or suspect that a student is subject to a private fostering arrangement. Staff should notify the DSL and record on CPOMS. The DSL will inform Children's Services who is looking after the Student and where they live. It is an offence for the carer and parent not to notify the Local Authority; a private foster carer could be putting themselves and their family at risk and miss out on help and support. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

#### Preventing Radicalization and Extremism.

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

The Counterterrorism and Security Act 2015, places a duty on all schools, in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism'. This duty is known as the Prevent duty, to ensure SHS fully meets this duty, we will have full regard to DfE, Prevent duty guidance (updated March 2016).

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

Safeguarding children from all risks of harm is an important part of our school's work and protecting them from extremism is one aspect of that.

The school has training sessions provided through the Lancashire Prevent Partnership Prevent offer.

#### Building children's resilience to Radicalisation

We build students' resilience to radicalisation by promoting our school and British values and enable them to develop critical thinking skills and challenge extremist views within a safe environment. We provide a safe place for students to understand the risks associated with terrorism and develop the skills to challenge it, through inclusion in PSHCE lessons. We ensure students know their **Single Point of Contact** is the DSL.

We also recognise how the 2012 Teachers' Standards are relevant to combating extremism. For example, the standards say that teachers must:

- show tolerance of and respect for the rights of others.
- not undermine fundamental British values.
- ensure that personal beliefs are not expressed in ways that exploit

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 of time.

Staff will be alert to changes in students' behaviour.

The government website <u>Educate Against Hate</u> and charity <u>NSPCC</u> say that signs that a pupil is being radicalised can include:

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

Children who are at risk of radicalisation may have low self-esteem or are 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 there is a concern a child may be at risk

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include <u>Channel</u>, 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 students. You can also email <u>counter.extremism@education.gov.uk</u>. Note that this is not for use in emergency situations.

#### Checking the identity and suitability of visitors

Visitors will be required to verify their identity to the satisfaction of staff upon entry to the school building.

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 in via Inventry and wear a visitor's badge.

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

- > Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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

#### Non-collection of children

If a child is not collected at the end of the session/day, we will:

- > Attempt to contact all numbers on the school system.
- If no contact is available, we will, where possible, ask the student to contact other relatives and the member of staff to ask if they can contact parents.
- > With consent of family members ensure student has transportation home, including walking.
- If school are unable to contact any parent or close family member, then a referral to the contact centre for advice and guidance is needed.

#### **Missing Students**

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

- > Conduct a search of the school grounds including through the use of CCTV
- > If it is deemed the student has left the site a call to the police will be made and the parent
- > If the parent is able to get in contact with the student we will inform the police.

Further procedures can be located in the Staff Safeguarding and Welfare Handbook.

#### What staff should look out for:

All Southlands staff should be aware of **signs of abuse and neglect** and be able to identify cases of students who may be in need of help or protection. There will be occasions when staff suspect a students may be at risk, but there is no real evidence to hand.

The students' behaviour may have changed, the artwork may be bizarre, increased lateness or absence, they may write stories or poetry that reveal confusion or distress, or staff may have noticed physical but inconclusive signs. In these circumstances staff should try and give the opportunity for the student to talk. The signs may have been due to a variety of factors e.g. pet died, moving house, and grandparent ill. It is fine to ask if the student is all right and ask if you can help in any way.

#### What staff should do if they have concerns about a student

The process for dealing with Child Protection concerns are:

- Recognise
- Respond
- Record and Refer
- Support

Staff should always act in the interests of the student when concerned about his/ her welfare and raise any concerns with a member of the Safeguarding Team without delay. This should be done by verbal communication (if the child is at immediate risk) followed by CPOMs completion. Visitors, volunteers or supply staff should visit reception to say they need to speak with the DSL. If staff are unsure about what to do or the level of concern, they should speak with the DSL, (if unavailable speak with a member of the Welfare Team or SLT).

In the exceptional case where no member of the Safeguarding Team or SLT is available, or the referring staff disagrees with the DSL's decision not to refer, or action is not taken swiftly enough by the DSL, then the staff member can refer their concern directly to:

- The Contact Centre Children's Social Care: 0300 123 6720
- Or NSPCC Child Protection Helpline 08001111

#### If a child is believed to be at immediate risk of harm: Police 999

If staff hear of, or know of, a student who has gone missing, they should report it immediately to the DSL

#### Referral to Social Care

If the DSL suspects the students to be at risk of, or is suffering from significant harm, then a referral to social care will be made and a s47 Enquiry (Child Protection Enquiry - see Children Act 1989) may commence. Lancashire Children's services also operate a low-level concern reporting form.

#### Notifying parents or carers

We will normally seek to discuss any concerns about a student with their parents. In line with our CSP this may mean that we seek parental consent to escalate a concern. However, SHS will act within GDPR policies and override the need to seek consent if it is felt doing so would mean Child Protection practices could not operate.

Informing parents of concerns must be handled sensitively, and the DSL will contact the parent unless the school believes that doing so could increase risk to the student or exacerbate the problem. In such cases the school will require Social Care to contact parents.

Parents will not be informed of a referral if it is thought that a parent is the abuser, it is unclear who the abuser it or if it could jeopardise a police investigation.

If no assessment is recommended, then an Early Help assessment may be. The DSL should ensure Social Care provide a rationale about their decision and record it.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

#### 10. PREVENTING ABUSE

Preventing abuse is a key element of the child protection and safeguarding work of SHS. Our staff training aims to ensure that all staff are fully alert to any kind of abuse and know what to look for and listen out for.

#### **The Curriculum**

At Southlands we are committed to ensuring that students learn to be prepared for life in modern Britain. We encourage them to be respectful citizens who are open to new experiences and are tolerant of others. Our values support the development of the whole child as a reflective learner within a safe respectful learning environment. For example, in lessons, students are encouraged to ask and answer questions and not be afraid to touch on controversial issues.

Our PSHCE (Personal, Social, Health and Citizenship Education) and RSHE curriculum which is delivered to all students, ensures that all students learn about safeguarding issues, both on and off-line, including what they mean, the harm they can bring, together with the signs and risks involved with each, and how to deal with them. We strive to equip our students with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves. We teach students to calculate risks, build resilience, develop critical thinking skills and promote good emotional wellbeing.

Students are regularly taught about how to recognise when they are at risk and how to get help when they need it. Students are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the internet.

#### Early Help

We are committed to identifying needs early, so we can reduce the chance of concerns escalating to a more serious level of need in the future. However, there are times when students' needs mean they require an enhanced level of support, either due to their own increasing complexity of need, or the impact of external factors. When early support is needed, the school welfare team work to ensure that the child is supported via the best service either through internal or external means. Please see SHS Safeguarding and Welfare Handbook for further information.

We are alert to the potential need for early help for a vulnerable Students who is:

- Disabled and has specific additional needs.
- Has special educational needs.
- A young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation.
- Is at risk of being radicalised or exploited.
- In a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Has returned home to their family from care.
- Is a privately fostered child.
- In a secure setting.

#### 11. REPORTING SYSTEMS FOR OUR STUDENTS

Students at SHS can access the SHARP (Self Help and Reporting Tool) form the school website to raise any concerns they have be it about home or school. Access to this can be from any device at any time via the school website. They can also tell a dedicated adult, another trusted adult, or a friend if they have any concerns.

#### 12. ONLINE SAFETY

Most of our students will use digital devices in and outside school. However, we know that some men, women and young people will use these technologies at some time to harm children. The harm might range from sending hurtful or abusive texts and emails to enticing children to engage in extremist behaviour, sexually harmful conversations and webcam or face-to-face meetings.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we

understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

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

#### The 4 key categories of risk

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

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

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

- > Educate students about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim
- > Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to noncontact time when students are not present
  - o Staff will not take pictures or recordings of students on their personal phones or cameras
- Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- > Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- > Make sure all staff, student and parents/carers are aware that staff have the power to search students' phones, as set out in the <u>DfE's guidance on searching, screening and confiscation</u>
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

- > Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- > Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- > Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

#### Filters and monitoring systems

The school has in place monitoring systems which monitor:

• The internet, network and email traffic of the school.

The domain names and/ or IP addresses of internet sites visited and domain, and IP addresses of email received.

• Data storage by individuals.

The school has filters in place which can identify improper use. These are monitored by staff trained to use the system and will notify the Year Managers of any concerns regarding the safeguarding and welfare of children. These will then be investigated and if necessary escalated to the DSL to follow child protection procedures which may include notifying parents and or a referral to children's social care, the police, channel or other services.

Cyber-bullying by students, via texts and emails, will be treated seriously, just as any other type of bullying and will be managed through our anti-bullying procedures, and also may be considered as a child protection issue depending on the nature of the incident.

#### 13. STAFF TRAINING

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- > Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- > Have regard to the Teachers' Standards to support the expectation that all teachers:
  - o Manage behaviour effectively to ensure a good and safe environment
  - o Have a clear understanding of the needs of all pupils

A register is kept of all those staff that have received training which is added to our Single Central Record.

All staff, including the Headteacher and governors, will receive training that is updated at least every year and the DSL will receive training every two years at the level for their role and responsibility, currently 'level 3'. All staff have been issued with Part one of *Keeping Children Safe in Education (2022)* Regular training offered to staff supports them to understand their statutory requirements and have regard to the teachers' standards to ensure they can ensure a safe environment as well as understanding students' needs.

Staff will be regularly updated on any changes and will receive regular bulletins and useful safeguarding information as appropriate to ensure that safeguarding remains a live issue and a priority for staff. Training will be integrated, aligned and considered as part of the whole school safeguarding approach, wider staff training and curriculum planning. 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.

Supply staff, volunteers and temporary staff will receive training by the DSL or Deputy DSLs and will be given the school's Visiting Staff Leaflet.

Contractors such as the caterers and cleaners will receive KCSIE updates and training in line with their contract and SLA.

#### 14. ACCOUNTABILITY

The DSL provides a termly report to governors to ensure that governors are fully aware of what the school is doing to ensure the safeguarding of all students, and that they are aware of any updates to legislation or guidance. Regular meetings are held for safeguarding and prevent to support and challenge the DSL regarding the safeguarding policy and practice. Regular reports enable the governors to discharge their responsibilities for safeguarding.

The DSL and DDSL each receive half termly supervision by an experienced and qualified safeguarding consultant. This enables them to reflect on their safeguarding practices, and provides support to manage caseload effectively and cope with the emotional demands of the role. Members of the wider team receive supervision on a needs basis completed by the DSL or Deputy. This policy will be reviewed **annually** by the DSL. At every review, it will be approved by the full governing board.

#### 15. PHOTOGRAPHY AND IMAGES

The vast majority of people who take or view photographs or videos of children, do so for entirely innocent, understandable and acceptable reasons. However, some people may abuse children through taking or viewing images. There may also be children in SHS who may be placed at risk by photographs being taken and shared, for example, children who are looked after or adopted or have been subject to previous abusive situations, so we must ensure that we have some safeguards in place.

#### To protect students at Southlands we:

- Seek their consent by parents for photographs to be taken or published
- e.g. on our website or in newspapers or publications.
- Seek parental consent on an annual basis.
- Use only the students' first names with an image.
- Ensure students are appropriately dressed.
- Encourage students to tell us if they are worried about any photographs that are taken of them.
- Ensure that photographs will only be taken on a school device.
- Ensure that photographs are only taken for reasons defined e.g. educational activity, evidence progress, promotional and celebratory.
- Ask that parents do not share any images of other children that may feature in the background of photographs that they have taken of their child Data protection does not prevent parents from taking photographs of their children at school events.
- Take seriously as a safeguarding concern any incident where a student has taken a photograph or video of another student/s, distributed it and/or uploaded it onto the internet.

#### Images for school publications

- The school will only take and use images that are appropriate and are considered to not be open to misuse.
- If an image of a student is used, the student's full name **will not** be published. If a name is published, **no image will be used** without specific consent.
- students will be made aware of why their picture is being taken and how it will be used.
- students will be given the option to not have their image used if they are the sole focus of the picture.
- students and parents should be encouraged to recognise the value of group photographs or recordings of school events.
- Images will be kept securely and held by the school for the duration of the student's time there, after which they will be destroyed. Images of students from the school will not be used to illustrate controversial subjects.

#### Images for the school website

School websites are part of the internet and are more easily accessible than paper-based school publications. The school will make sure that only appropriate images are used. Image filenames will avoid using children's names.

#### Images taken by parents, carers or family members

- Parents, carers or family members and friends can take images of their child and friends participating in school activities for family and personal use.
- Parents should ask for their permission before photography is allowed.

Before they are allowed to take images during school activities, parents or carers should have signed an agreement that any images they take will not be used inappropriately.

Parents or family members wishing to take images during an activity will be asked to sign a dated register
agreeing not to share any images of other children that may feature in the background of photographs that
they have taken of their child.

#### Photography and video filming will be limited to designated areas.

#### 16. SAFER WORKING PRACTICES FOR STAFF

Expected standards for all staff are set out in SHS Staff Code of Conduct. Alongside this, all teachers are expected to adhere to the *Teacher Standards 2012* and all staff should adhere to the *Safer Recruitment Consortium, 'Guidance for Safer Working Practice for Adults Who Work with Children' (2015).* 'All staff' includes anyone working in the school.

In accordance with the Teacher Standards 2012, all staff at Southlands (including support staff and the Headteacher), have a duty to safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff at Southlands are expected to identify students who may require extra help, or who are suffering, or are likely to suffer, significant harm. All staff have a duty to take appropriate action in accordance with this policy.

All staff are expected to follow the staff Code of Conduct and always conduct themselves professionally and appropriately, always maintaining professional boundaries.

All staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be professional at all times and beyond reproach, maintaining professional boundaries.

All staff have a responsibility to ensure that the unequal balance of power between staff member and students is not used for their personal advantage or gratification.

In addition, staff should understand that, under the Sexual Offence Act 2003, it is an offence for a person over the age of 18 to have a sexual relation with a person under the age of 18, where that person is in a position of trust, even if that relationship is consensual. This means that any sexual activity between a member of school staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

#### Poor practice amongst staff

The school takes seriously any complaint or concern raised by parents, students or other staff regarding poor practice towards students, which does not initially reach the threshold for child protection action.

Upon investigation of the complaint or concern, it is likely that the school's disciplinary procedures will be followed if the complaint or concern is substantiated. Our complaints and disciplinary procedure will be followed where a student or parent raises concern about poor practice towards a student (see website for complaints procedure).

Examples of poor practice includes:

- Singling a student out
- Using sarcasm or humiliation as a form of control.
- Bullying or belittling a student or discriminating against them in some way.

These practices are not exhaustive.

The Headteacher, senior staff and governors manage complaints. Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

#### **Communication with students using Information Technology**

Communication between staff and students should take place within clear and explicit professional boundaries. This includes use of mobile phone text messaging, emails, social media websites, digital cameras, blogs, videos, webcams and websites.

Staff should not give students, parents or carers, their personal contact details e.g., mobile phone number, or details of any blogs or personal websites e.g., Facebook and not to any past Students who is under 25 years old. This also applies when staff are on a school trip.

Staff should only contact students for professional reasons and only in accordance with the school's policy. They should not request or respond to any personal information from the students other than that which is appropriate to their professional role. **All communications should be open and transparent.** Any concern or doubt about levels of communication with or from students should be discussed with DSL, Safeguarding Team, or if unavailable, a member of SLT.

When staff are out with students on a school trip, staff should use the school mobiles to communicate with students, not their personal mobile phones.

They should not give students their mobile number, unless in the exceptional circumstance of the school mobiles being lost, stolen or broken and this has been agreed with the Headteacher or DSL. Staff should ensure the school phones are fully charged.

Staff should not use the internet or web-based communication channels to send personal messages to students.

Staff should ensure that if a social networking site is used, details are not shared with students and privacy settings are set to maximum. It is also advised that staff should avoid using an identifiable profile picture or their full name as known in school.

#### 17. SAFER RECURITMENT

At SHS we work to ensure that our recruitment selection and pre-employment vetting is secure and follows procedures as required in Part 3 of KCSIE 2023.

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

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

#### Advertising

When advertising roles, we will make clear:

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

need to be disclosed, and if they are disclosed, we cannot take them into account

#### **Application forms**

Our application forms will:

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

#### Shortlisting

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

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

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

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

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

#### Seeking references and checking employment history

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

When seeking references we will:

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

#### Interview and selection

When interviewing candidates, we will:

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

> Record all information considered and decisions made

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

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

#### 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.

#### New staff

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

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

#### **Existing staff**

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

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

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where: > We believe the individual has engaged in <u>relevant conduct</u>; or

> We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the

right to make representations) offence, under the <u>Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and</u> <u>Miscellaneous Provisions) Regulations 2009;</u> or

- > We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- > The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

#### Agency and third-party staff

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

#### Contractors

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

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

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

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

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

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

#### **Trainee/student teachers**

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

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

#### Volunteers

We will:

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

#### Governors

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

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

The chair of the board will have their DBS check countersigned by the secretary of state. All proprietors, trustees, local governors and members will also have the following checks:

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

#### Staff working in alternative provision settings

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

#### Adults who supervise students on work experience

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

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

#### 18. ALLEGATIONS OF ABUSE MADE AGAINST TEACHERS AND OTHER STAFF

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

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

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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).

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

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

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

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

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

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

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

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

#### Definitions for outcomes of allegation investigations

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

#### Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- > Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- If it is decided that no further action is to be taken 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 (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

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

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

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

#### **Timescales**

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

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

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

#### **Specific actions**

#### Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, 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 school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

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

#### Individuals returning to work after suspension

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

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

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

If a report is:

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

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

If an allegation is:

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

#### Confidentiality and information sharing

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

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

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

#### **Record-keeping**

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

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

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

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

#### References

When providing employer references, we will:

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

#### Learning lessons

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

This will include consideration of (as applicable):

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

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

#### **Non-recent allegations**

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

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

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

#### Concerns that do not meet the harm threshold.

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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

#### Concerns may arise through, for example:

- > Suspicion
- > Complaint
- > Safeguarding concern or allegation from another member of staff
- > Disclosure made by a child, parent or other adult within or outside the school
- > Pre-employment vetting checks

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

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

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

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

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

- > Being overly friendly with children
- > Having favourites
- > Taking photographs of children on their mobile phone
- > Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

> Humiliating students

#### Sharing low-level concerns

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

We will create this culture by:

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

#### Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

#### **Record keeping**

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

Records will be:

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

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

#### References

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

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

Whistleblowing is the term used when a worker passes on information concerning wrongdoing.

It is important that all professionals have the confidence to come forward to speak or act if they are unhappy with anything and that they will be supported by the school to do this. Whistleblowing occurs when a person raises a concern about dangerous, illegal activity or any wrongdoing within the school e.g.:

- Potentially vital information about health and safety risks
- Possible fraud.
- Harm of children or vulnerable adults
- Concerned or worried about someone's behaviour

It is essential these issues are addressed immediately, so, 'blowing the whistle' as early as possible is important in order to prevent further harm being done.

#### If you have concerns about a colleague

Concerns relate to allegations that a member of staff has:

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

All concerns of poor practice or possible child abuse by colleagues must be reported immediately to the Headteacher.

If the Headteacher is absent, then the concern must be raised with the DSL. In the absence of the DSL, raise a concern with the DDSL. The concern must not be discussed with other colleagues. Complaints about the Headteacher should be reported to the Chair of Governors.

#### If you have concerns about safeguarding practices within the school

Whistleblowing is the term used when a worker passes on information concerning wrongdoing.

All staff should feel they are able to raise concerns about poor or unsafe practice and potential failure in the safeguarding regime with the SLT, knowing they will be taken seriously.

It is important that all professionals have the confidence to come forward to speak or act if they are unhappy with anything and that they will be supported by the school to do this.

Whistleblowing occurs when a person raises a concern about dangerous, illegal activity or any wrongdoing within the school e.g.:

- Potentially vital information about health and safety risks
- Possible fraud
- Harm of children or vulnerable adults
- Concerned or worried about someone's behaviour.

However, if a staff member feels unable to do this or that their genuine concerns are not being addressed, they can contact:

The NSPCC whistleblowing helpline (08000 280285) / email help@nspcc.org.uk Furthermore, you can see the Mosiac Learning Trust Whistleblowing Policy.

#### **19.AFTERSCHOOL AND OFF-SITE ARRANGEMENTS**

Where after school activities are provided and managed by the school, our own Child Protection policy and procedures apply.

#### Use of School Premises by external providers

As an active part of the local community, on occasion, school facilities may be let out to community groups, sports clubs or other organisations. These lettings are overseen by Northwest School Hire Ltd. All associated lettings agreements and necessary safeguarding information linked to Northwest School Hire Ltd Lettings can be found on Northwest School Hire Ltd website. Should a safeguarding issue arise, or an allegation be made against an adult during school site community use,

Northwest School Hire Ltd would deal with this in the first instance in line with their safeguarding protocols and would notify school asap. Upon receiving such notifications school would follow normal safeguarding protocols and if necessary, would refer to LADO. Northwest School Hire Ltd and school may suspend or stop use of facilities if warranted as a result of a safeguarding issue.

#### Actions where there are concerns about a child



#### Appendix 2: DBS Flowchart

