

Child Protection and Safeguarding Policy

(including safer recruitment, allegations against staff and low-level concerns)

Releasing Potential Independent School



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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)/Head of School	Catherine Brennan	catherine@releasingpotential.com 01243 778202 02392 479762
Deputy DSL/Head of Centre	Katy Green Chichester	katy@releasingpotential.com 01243 778202
	Wayne Peters Havant	wayne@releasingpotential.com 02392 479762
Executive Head Teacher	Mike King	mike@releasingpotential.com 01243 778202 02392 479762
Chair of trustees	Paul Suter	
Safeguarding trustee	Polly Honeychurch	
Local Authority Designated Officer (LADO)	Hampshire West Sussex	01962 876364 0330 2226450

1. Aims

The school aims to ensure that:

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

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance *Keeping Children Safe in Education (2022)*, *Working Together to Safeguard Children (2018)* and the *Governance Handbook*. We comply with this guidance and arrangements agreed and published by the 3 local safeguarding partners in the local authorities where we work.

This policy is also based on the following legislation:

- Part 3 of the schedule to the *Independent School Standards (2014)*
- The Children's Act 1989 (and 2004 amendment) which provides a framework for the care and protection of children
- *Section 5B (11)* of the Female Genital Mutilation Act 2003 as inserted by section 74 of the Serious Crime Act 2015 which places a statutory duty on teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18

- Statutory guidance on FGM which sets out responsibilities with regard to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974 which outlines when people with criminal records can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006s which defines what 'regulated activity is in relation to children
- Statutory guidance on the Prevent duty which explains schools' duties under the Counter Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998 which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010 which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our trustees and senior leadership team should carefully consider how they are supporting students with regard to these characteristics. The Act allows the school to take positive action to deal with particular disadvantages affecting students (where we can show it's proportionate). This includes making reasonable adjustments for disabled students. For example it could include taking positive action to support girls where there is evidence that they're being disproportionately subjected to sexual violence or harassment.
- The Public Sector Equality Duty which explains that we must have due regard to eliminating unlawful discrimination, harassment or victimisation. The PSED helps us focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

3. Definitions

Safeguarding and promoting the welfare of children means:

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

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

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

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

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

Children includes everyone under the age of 18.

The following **safeguarding partners** are identified in Keeping Children Safe in Education and defined in the Children's 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 partners are:

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

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 in that way. When managing an incident we will be prepared to use any term that the child involved feels 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.

4. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities 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
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and trustees in the school and is consistent with the procedures of local safeguarding arrangements. Our policy and procedures also apply to 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:

- Behaviour policy
- Pastoral support
- RHSE curriculum which is inclusive and delivered regularly tackling issues such as:
- Healthy and respectful relationships
- Staff Code of Conduct
- Equality and Diversity Policy
- The promotion of body confidence and self-esteem
- Ability 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 violence such as forced marriage and female genital mutilation (FGM)
- What constitutes sexual harassment and sexual violence and why they are always unacceptable

Note that for the purposes of this policy, all delivery staff are considered to be teachers.

5.1 All staff

All staff will:

- Read and understand part 1 of Keeping Children Safe in Education (KCSIE) and annex B of KCSIE (about specific safeguarding issues) annually and sign a declaration to confirm this
- Sign a declaration at the beginning of each academic year to say that they have read and understood this policy
- Reinforce the importance of online safety with communicating with parents. This includes making parents aware of what we ask children to do online (eg sites they will need to visit or who they will be interacting with online)
- Provide a safe space for students who are LGBT to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff handbook, staff code of conduct, online safety policy, behaviour policy and the safeguarding response to children who go missing from education

- The early help assessment process 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 may be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues such as child-on-child-abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of risk from or involved in serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and out side of their home, at school and online
- The fact that children who are, or are perceived to be, lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more details how staff are supported to do this

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Catherine Brennan. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time the DSL will be available in school hours for staff to discuss any safeguarding concerns.

The DSL can be contacted out of school hours in an emergency by email on catherine@releasingpotential.com

When the DSL is absent the Deputy DSL – Katy Green, Centre Manager at Chichester, or Wayne Peters, Centre Manager at Havant, will act as cover.

If the DSL and Deputy DSLs are not available one of the other trained DSLs, Iain Sillars, Russell Tapley, Janet Cornall or Carol Page will act as cover.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children

- Refer suspected cases, as appropriate, to the relevant body (local authority) children's social care, Disclosure and Barring Service and/or police and to support staff who make referrals directly
- Have a good understanding of harmful sexual behaviour

The DSL will also:

- Keep the Executive Head Teacher informed of any issues
- Act as 'case manager' in the event of an allegation of abuse against another staff member
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support
- Be aware that children must have an appropriate adult to support and help them in the case of a police investigation or search

5.3 The Trustees

The Trustees will:

- Facilitate a whole school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law and hold the Head Teacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty) and our school's local multi-agency safeguarding arrangements
- Appoint a link trustee to monitor the effectiveness of this policy, in conjunction with the full board
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including volunteers and contractors). Appendix 3 covers this procedure

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

Where another body is providing services or activities:

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding where appropriate

The chair of trustees will act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher.

All trustees will read KCSIE in its entirety

Section 15 of this policy has information about how trustees will be supported to fulfil their role.

5.4 The Executive Head Teacher

The Head Teacher is responsible for the implementation of this policy including:

- Ensuring that staff including volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has the appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against the DSL
- Collaborating with the DSL regarding decisions on low-level concerns

6. Confidentiality

Releasing Potential works with regard to the Data Protection Act (2018) and the GDPR

However:

- We understand that The DPA and GDPR do not prevent or limit the sharing of information for the purpose of keeping children safe
- We understand that timely information sharing is essential to safeguarding
- We understand that fears about sharing information should not stand in the way of the need to promote the welfare and protect the safety of children
- If staff need to share 'special category personal data' the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent, if it is not possible to gain consent
- Staff should never promise a child that they will not tell anyone about a report of abuse as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about sexual violence or sexual harassment:
 - There is no definitive answer because even if a victim doesn't consent to sharing information staff may still lawfully share it if there is another legal basis under the 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 the local authority children's services
 - 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, 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
 - Consider the potential impact of social media in facilitating the spread of rumours and exposing victims' identities

The government's '7 Golden Rules for Information Sharing' are displayed in the staff offices to support staff with decisions about information sharing.

If staff are in any doubt about sharing information they should speak with the DSL or Deputy for advice.

7. Recognising abuse and taking action

Staff, volunteers and governors must follow procedures set out below in the event of a safeguarding issue. In this and subsequent sections any references to the DSL mean 'the DSL or Deputy DSL'

All safeguarding concerns should be logged in the safeguarding box on the Learn Trek portal as soon as possible after the staff member has the information but by the end of that day at the latest.

7.1 if a child is suffering from or is likely to suffer harm, or in immediate danger

If staff believe a student is suffering from or is likely to suffer harm or is in immediate danger they should contact the DSL **immediately**. See appendix ** for details of what to do in the rare circumstance that it is not possible to contact any DSLs or deputies.

7.2 If a child makes a disclosure to you

- If a child discloses a safeguarding issue to you should:
- Listen to and believe them, Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts and do not put your own judgement on it
- Speak to the DSL immediately and pass on the disclosure and written account
- Upload the written account up to the Learn Trek portal as soon as possible
- Aside from the DSL do not disclose the information to anyone else unless told to do so by a relevant authority
- Ensure that you get support from the DSL if needed

Bear in mind that some children may:

- Not feel ready to know how to tell 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.

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

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

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

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

Any teacher who either:

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

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

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

Any other member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to the DSL and follow local safeguarding procedures (see p.10)

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

7.4 If you have concerns about a child (as opposed to believing that child is suffering or likely to suffer from harm, or is in immediate danger)

All safeguarding concerns should be logged in the safeguarding box on the Learn Trek portal as soon as possible after the staff member has the information but by the end of that day at the latest.

Information should also be shared with appropriate colleagues asap.

Figure 1 illustrates, below, the procedure to follow if you have any concerns about a child’s welfare.

Where possible speak to the DSL first to agree a course of action. If, in exceptional circumstances the DSL is not available this should not delay the appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as possible and make a note on the safeguarding area of the portal.

Early help assessment

If an early help assessment is appropriate the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation doesn't seem to be improving. Timelines of interventions will be monitored and reviewed.

In Hampshire Early Help can be accessed through the MASH (see contact details in Appendix 3).

In West Sussex Early Help can be accessed through the Integrated Front Door (IFD) (see contact details in Appendix 3)

Referral

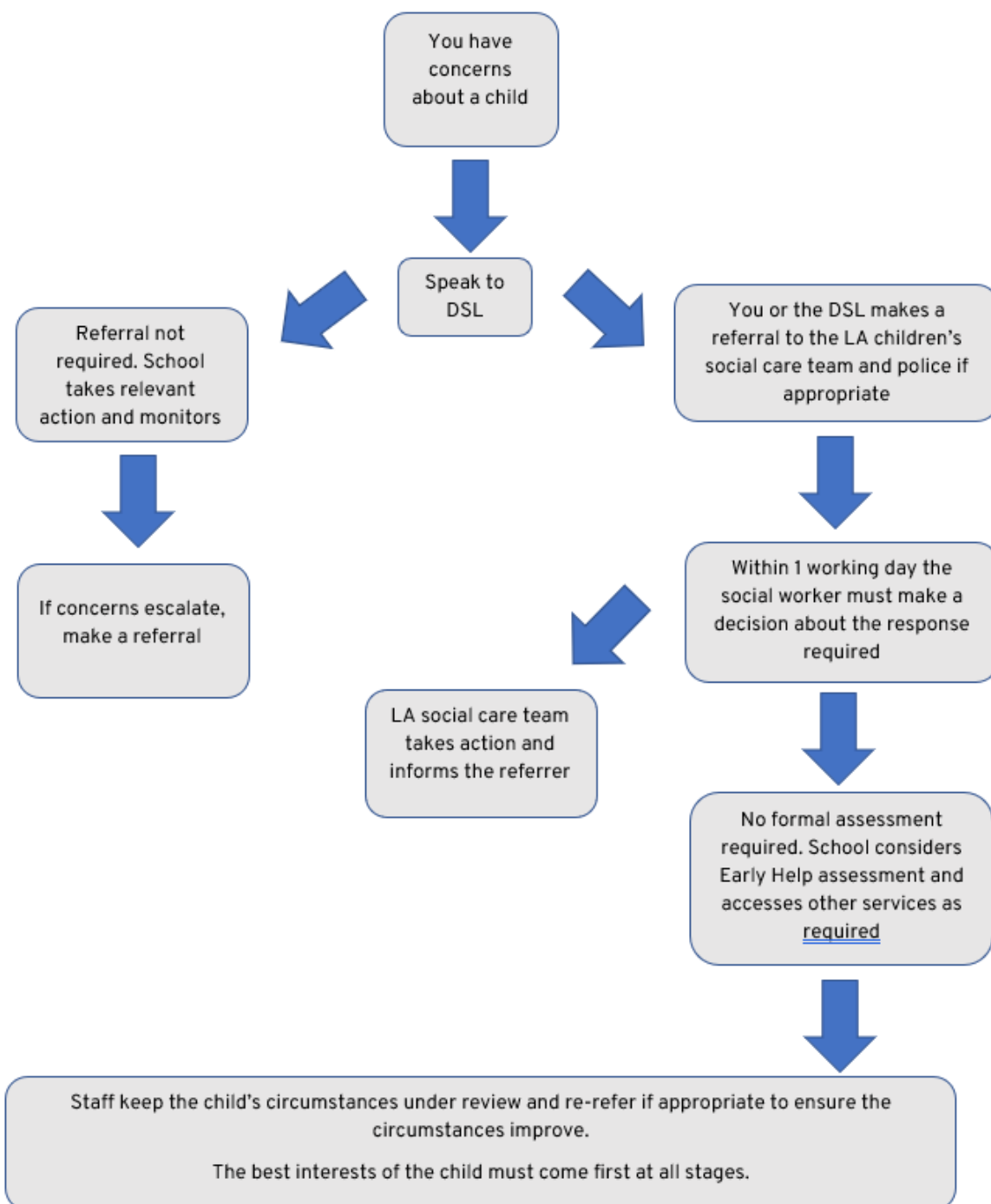
If it is appropriate to refer the case to the local authority children's social care or the police the DSL will make the referral.

If, in exceptional circumstances a staff member makes a referral directly they must tell the DSL as soon as possible.

The local authority should make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available and ensure the outcomes are properly recorded.

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

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



7.5 If you have a concern about extremism

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

If, in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice

from local authority children's social care. Make a referral to the local authority children's social care directly, if appropriate. Inform the DSL or deputy as soon as possible after the referral.

Where there is a concern the DSL will consider the level of risk and decide which agency to make the referral to.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governance can call to raise concerns about extremism in respect of a student. You can also email counter.extremis@education.gov.uk Please speak to the DSL before calling this helpline and note that this is not for use in emergency situations.

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

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

7.6 If you have a mental health concern

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a concern about a child that is also a safeguarding concern take immediate action by referring to the steps in 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

7.7 Concerns about a staff member, volunteer or contractor

If you have concerns about a member of staff (including volunteer or contractor) or an allegation is made about a member of staff (including volunteer or contractor) posing a risk of harm to children, speak to the Head Teacher as soon as possible. If the concerns/allegations are about the Head Teacher, speak to the chair of trustees.

The Head Teacher or chair of trustees will then follow the procedures set out in appendix 3 if appropriate. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a volunteer or contractor) to the Head Teacher, report it directly to the appropriate local authority designated officer (LADO).

7.8 Allegations of abuse made against other students

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

Most cases of students hurting other students will be dealt with under the school behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

See appendix 1 for more information on child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

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

- You must record the allegation on the portal 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 in place for all children involved (including the victim(s) and 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 children and adolescent mental health service (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.

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

We recognise the importance of taking proactive steps 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 educate students about appropriate behaviour and consent
- Ensure students are able to easily and confidently report abuse using our reporting systems described in 7.10 below)
- 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 that 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 doesn't 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 hear a conversation
 - A child's behaviour might indicate that something is wrong
 - That vulnerable children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a student harming a peer could be a sign that the child is being abused themselves and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk of it
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between 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 disciplinary action.

Disciplinary action can be taken while other investigations are ongoing, eg 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, taking into account whether:

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

7.9 Sharing nudes and semi-nudes (sexting)

Staff responsibilities when reporting an incident

If a staff member is 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’) they must report it to the DSL immediately and write it up on the portal as soon as possible.

Staff must **not**:

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

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

Initial review meeting

Following a report of an incident the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the Centre Manager. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to 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 outcome
- 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 the 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 informed)

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 their special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
- The imagery involves sexual acts and any student in the images or videos is under 13
- The DSL has reason to believe a student 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 the DSL, in consultation with the Executive Head Teacher 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 the police 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 student(s) involved if appropriate.

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

Informing parents/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 student at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police this will be done by dialling 101.

Recording incidents

All incidents of sharing nudes or semi-nudes, and the decisions made in responding to them, will be recorded and the notes uploaded by the DSL onto the portal. The record

keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSE curriculum. Teaching covers the following in relation to 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

7.10 Reporting systems for our students

Where there is a safeguarding concern we will take the child's wishes and feelings into account when determining what action is to be taken and what services to provide.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this we will:

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

Students are informed and reminded in RSE lessons about the processes in place at school for reporting safeguarding concerns, See also appendix ** for the safeguarding leaflet/poster made available to students.

8. Online safety and use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this our school aims to:

- Have robust processes in place to endure the online safety of students, staff, volunteers and trustees
- 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, 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, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or cause, harm, such as making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit messages and online bullying
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address these risks 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 and carers about online safety via our website, communication sent directly to the and during target setting meetings. 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 work for their own use but will limit such use to non-contact time when students are not present
 - Staff will not take pictures or recordings of students on their personal phones or cameras

- Make all students, parents/carers, staff, volunteers and trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school IT systems and use of their mobile phones 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 phone
- Put in place filtering and monitoring systems to limit children's exposure to the 4 key categories of risk from the school's IT systems

For full details about our school approach to online safety and the use of mobile phones please see our E-safety policy.

9. Notifying parents or carers

Where appropriate we will discuss any concerns about a child with their parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about such concerns following consultation with the DSL.

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

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

The DSL, will, along with any relevant agencies (decided on a case-by-case basis):

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

10. Students with special educational needs, disabilities and health issues

All our students have Education Health and Care Plans because of their social, emotional and mental health (SEMH) needs and our systems and processes are designed to identify and act promptly on safeguarding concerns. We recognise that children with SEMH or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

Staff are well trained in working with children who have SEMH.

Staff understand that they must report all safeguarding concerns to the DSL and record the on the Learn Trek portal daily.

All staff are trained to record information which will add to the wider picture of what is happening with the child, even when the information may not represent a safeguarding concern in itself; this is logged on the Learn Trek portal at the end of each day.

High staff ratio and small groups/1:1 delivery enable the school to have a clear and up-to-date picture of each child's safety and well-being.

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

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

12. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after

legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

· The DSL has details of children's social workers We have appointed an appropriately trained teacher, Catherine Brennan, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

· Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

13. Complaints and concerns about school safeguarding policies

11.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 2).

11.2 Other complaints

Other complaints are dealt with in the school under the Complaints Policy which is published on the website.

11.3 Whistle-blowing

The school has a Whistle-blowing policy which is a route through which staff and visitors can report concerns. The policy is advertised in school offices and available on the website. (see Whistle-blowing Policy)

14. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded in writing on the Learn Trek portal. If in doubt about whether to record something discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in the safeguarding area of the Learn Trek portal
Any non-confidential records will be readily accessible and available on the Learn Trek portal.

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

Safeguarding records relating to individual children will be archived after the child has left the school.

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

To allow the new school/college to have support in place when the child arrives this should be within:

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

All student records are held on the Learn Trek portal which is web-based and secure. Staff access the portal using secure passwords and access only the areas where there is a professional need for them to do so. Only the DSL and School SLT have access to the safeguarding area of the portal. The school retains an external contractor to maintain the portal and ensure that all records are secure.

The school will share information where appropriate with other agencies in line with our safeguarding policy.

15. Training

15.1 All staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training and curriculum planning
- Be in line with advice from local safeguarding arrangements
- Have regard to school policies on behaviour management and needs/risk assessment

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

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

Contractors who deliver to students will also receive safeguarding training.

Volunteers will receive appropriate training if applicable

15.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding and training at least every 2 years.

In addition they will update their knowledge and skills at regular intervals and at least annually (for example through emails, bulletins, meeting with other DSLs or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Trustees

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

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

15.4 Recruitment

At least one person conducting interviews for any post at the school will have undertaken the safer recruitment training. This will cover, as a minimum, the contents of *Keeping Children Safe in Education*, and will be in line with local safeguarding procedures. (See appendix 7. for Safer Recruitment policy).

Monitoring arrangements

This policy will be reviewed annually by Catherine Brennan, the DSL. At every review it will be approved by the full board of trustees.

Links with other policies

This policy links to the following policies and procedures

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety

- Mobile phone use
- Equality and Diversity
- Relationships and sex education
- First Aid
- Curriculum

APPENDICES

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

Appendix 1: Specific safeguarding issues

This appendix is mostly based on advice in *Keeping Children Safe in Education*, in particular Annex B.

Children missing from education

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

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

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

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

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

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

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into

criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

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

Indicators of CCE can include a child:

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

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

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

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

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

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

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise 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 is not limited to:

- Bullying (including cyber-bullying, prejudice-based bullying 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, 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 stand alone 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 involve activities including harassment, abuse or humiliation used as a way of initiating a person into a group, and may include an online element)

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

If staff have any concerns about child-on-child abuse or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

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.

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 can 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, psychological, financial 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 age, gender, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside 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 are in the household have experienced the incident, the police will inform the key adult in the school (usually the DSL) before the child or children arrive at school the following day.

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

Homelessness

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

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

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

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

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

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

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

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than usual in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or 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 medical examination
 - Asking for help but not being explicit about the problem
 - Talking about pain or discomfort between her legs
- Potential signs that a child may be at risk of FGM include:
 - The girl's family having a history of practising FGM (this is the biggest risk factor)
 - 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 with 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 parent/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’ (and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication)

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

Forced marriage

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

Staff will receive training around forced marriage and the presenting signs. We are aware of the ‘once chance’ rule ie we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the LADO
- Seek advice from the Forced Marriage on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student to an education welfare officer or counselling service as appropriate

Preventing radicalisation

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

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

- Terrorism is an action that:
 - Endangers or causes serious violence to a person/people
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to the appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the particular risk in our local area, in collaboration with our local safeguarding partners and local police services.

We will ensure that suitable internet filtering is in place and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in students' behaviour.

The government website Educate against Hate and charity NSPCC say that signs a student is being radicalised can include:

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

Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a student they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Sexual violence and sexual harassment between children in the school

Sexual violence and 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 (physically and verbally)

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

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

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

When supporting victims staff will:

- Reassure them that the law on child-on-child abuse is there to protect them, not to criminalise them
- Regularly review decisions and actions and update policies when lessons are learned
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify 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 are not acceptable, will never be tolerated and is not an inevitable part of growing up

- Challenging physical behaviours (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy as appropriate. In particular section 7.8 and 7.9 set out ore detail about our school’s approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk of or involved with serous 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 a 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 exclude from school
- Having been involved in offending such as theft or robbery

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

Checking the identity and suitability of visitors

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

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

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

Visitors to the school who are visiting for a professional purpose, such as social workers, inspectors, will be asked to show photo ID and:

The organisation sending the professional such as the LA, will provide prior written confirmation that an appropriate level of DBS check has been carried out

All other visitors will be accompanied by a member of staff at all times.

Missing students

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. All our children are supervised at all times. If a child walks off site we will:

- Follow at a distance for as long as possible and wait for the child to engage with us
- Make an immediate report to the police, social worker and carer if the child is Looked After and is out of sight for more than 5 minutes
- Make an immediate call to parents if the child is out of sight for more than 10 minutes

Appendix 2: Allegations of abuse made against staff (including low-level concerns) policy

Section 1: allegations which may meet the harm threshold

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

- Behaved in a way which 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 inside and outside of school

If we are in any doubt as to whether a concern meets the harm threshold we will consult the 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 whilst supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Head Teacher, or the Chair of trustees where the allegation is about the Head Teacher.

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 is 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 school so that the individual does not have contact with the child or children involved
- Providing another member of staff 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 and carers have been consulted
- Temporarily redeploying the individual to another role in a different location

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

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 of a 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 steps below
- Discuss the allegation with the LADO. 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. (The case manager may, on occasion, deem it necessary to involve the police before contacting the LADO, for example if the accused is believed to be a risk to children or there is evidence of a criminal offence. In such cases the case manager will notify the LADO as soon as practicable 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 LADO (and police and children's social care if applicable). Where the police and/or children's social care 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 LADO, police and/or children's social care 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 LADO. The record will include information about the alternatives to

suspension which 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 LADO what information should be put in writing to the individual and by whom, as well as what action should follow in respect of the individual and those who made the allegation

If it is decided that further action is needed, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children's social care 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 such as the Employee Assistance Programme to which the school subscribes
- Inform the parents or carers of the child/children involved about this allegation as soon as possible if they do not already know (following agreement with the 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 the investigations are ongoing.
- Keep parents or carers of the child/children involved and 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 contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a member of staff working on an SLA, 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 the LADO to determine a suitable outcome

- The trustees will discuss with the external employer, if applicable, 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 address issues such as information sharing, to ensure any previous concerns or allegations known to the external employer are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the external employer where necessary)

When using an external employer we will inform them of our process for managing allegations and keep them updated about our policies as necessary, and we will invite their 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 LADO 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.

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 list is required.

If the individual concerned is a teacher the school will consider whether to refer the matter to the Teacher Regulation Agency to consider prohibiting the individual from teaching.

Individual returning to work after suspension

If it is decided on 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 LADO and case manager will consider the appropriate next steps. If they consider that the child/children who made the allegation is/are 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 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/young 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 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 involved aware of their obligations in 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 such records to be retained).

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 where appropriate.

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

References

When providing references we will:

- Not refer to any allegation which 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 LADO 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 (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 to the LADO any non-recent allegations made by a child in line with the 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 them to take the allegation to the police.

Section 2: concerns that don't meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including 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 that 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 work and
- Does not meet the allegations threshold or is otherwise not considered serious enough to refer to the LADO

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

- Being overly friendly with children
- Having favourites
- Taking photos of children on their mobile phone
- 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 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 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 Head Teacher 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 in any witness

The Head Teacher 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 Head Teacher 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 concerns 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 LADO
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a 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 LADO and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 3

Direct referral to Local Authority Social Care

If, in the unlikely event that staff are unable to contact the DSL or deputies they should

Make a referral to the children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Staff should the DSL as soon as possible if they make a referral directly.

In Hampshire referrals are made via the Multi Agency Safeguarding Hub (MASH):

0300 555 1384 (office hours)

0300 555 1373 (out of hours)

In West Sussex referrals are made via the Integrated Front Door (IFD):

01403 229 900 (office hours)

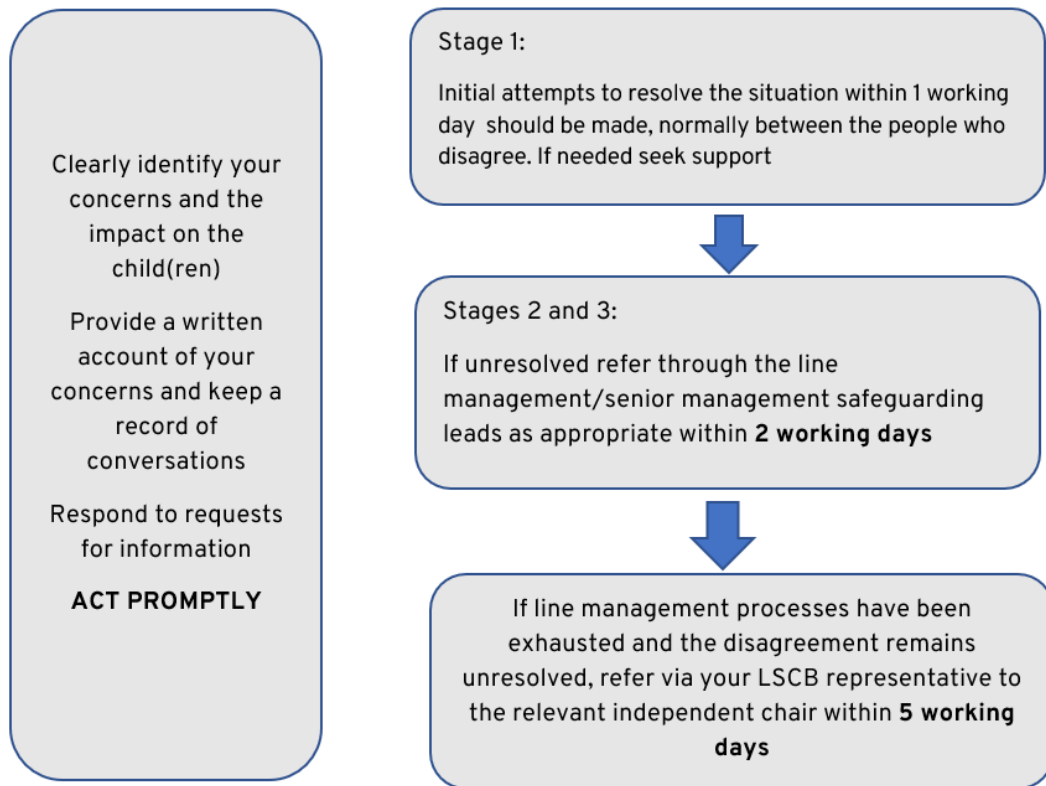
033 022 26664 (Emergencies)

There is also a government web page for reporting child abuse to the local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

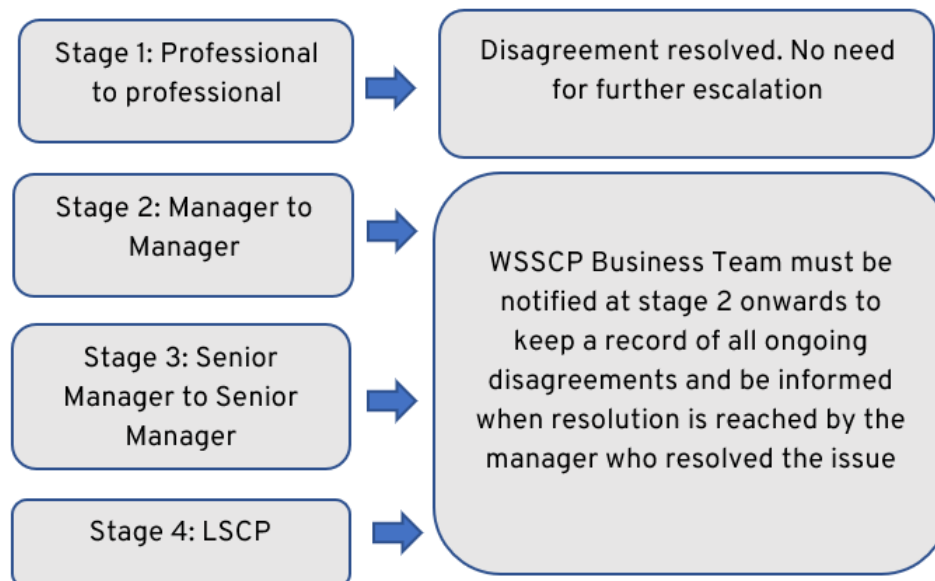
Appendix 4: Local Escalation procedures

Hampshire Escalation Policy



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West Sussex Escalation Procedure



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Appendix 5:

Student Safeguarding Leaflet

Working together to keep you safe and happy

What is child protection?

We do our best to help you make good progress in your learning and to be happy. We teach you how to recognise risks in different situations and how to protect yourselves and stay safe

What is safeguarding?

At RP we think you deserve to feel safe, happy, secure, loved and special. All the adults around you at school think your health, safety and wellbeing are very important. Safeguarding is what we do to keep you all safe whilst you are at school

Remember:
Tell a trusted adult if someone is:

- Bullying you
Saying things to you that upset you or make you feel uncomfortable
- Touching you in ways that make you feel uncomfortable
- Hitting or hurting you
- Taking your things
- Sending unkind messages on the internet or to your phone

Who can you talk to?

If you are worried about something you can talk to an adult in school. This could be one of your tutors, the Centre Manager in your school building or one of the Designated Safeguarding Leads, they are:

How will we try and protect you?

We will try and provide a safe environment for you to learn in. We want to make sure you are safe at home as well as in school. We think it is important for you to know where to get help if you are worried or unhappy about something. If you need to talk we will listen.



Katy



&



Catherine



Appendix 6: types of abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

Appendix 7: Safer Recruitment policy

Recruitment and selection policy process

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

Advertising

When advertising we will make clear:

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

Application forms

Our application forms will:

Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

Include a copy of or link to our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Once we have shortlisted candidates we will ask shortlisted candidates to:
- Complete a self declaration of their criminal record or any information which would make them unsuitable to work with children so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list

- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search of 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
- 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 made

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 the candidate to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

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

New staff

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

- Verify their identity

- Obtain 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 keep a record on the SCR of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they 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 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 the UK. These could include, where available:
 - For all staff, including teaching positions: criminal records checks for overseas applicants
- Check that candidates taking up a management position¹ are not subject to a prohibition from management (section 128) direction made by the Secretary of State

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 unsupervised or not

Existing staff

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

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

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

- We believe the individual has engaged in relevant conduct; or

¹ Management positions are most likely to include, but are not limited to, head teachers, principles and deputy/assistant headteachers

- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without a right to make representations) offence under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (ie 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

Third party staff

We do not use agency or supply staff.

Contractors

When we employ staff under a Service Level Agreement (SLA) we will carry out the necessary safer recruitment checks.

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

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

Trustees

All trustees will have an enhanced DBS check without barred list information. They will have barred list information if working in regulated activity.

All proprietors and trustees will also have the following checks:

- Section 128 (to check on 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 setting

Where we place a student with an alternative 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

Our work experience placements are almost always carried out in our in-house business settings and all staff therefore undergo school vetting and training.

On rare occasions where it is deemed appropriate for a student to undertake an external work experience we will consider whether it is necessary for barred checklists to be carried out on the individuals who supervise a student 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 and whether the activity is regulated.