

## SAFEGUARDING AND CHILD PROTECTION POLICY – SCHOOLS

THIS POLICY IS REVIEWED ON AN ANNUAL BASIS, WHEN CHANGES IN OFFICIAL GUIDANCE REQUIRE AND FOLLOWING A SAFEGUARDING INCIDENT

**Policy reviewed by:** Viv Thompson – Director of Education and Safeguarding/ Chair of Advisory Board

**Version:** v8.1

**Policy actioned from:** 21.04.2026

**Next review date:** 01/08/2026

**Reviewers' Signature:**



Please note: 'School' refers to Chatsworth Schools; 'parents' refers to parents, guardians and carers. This is a whole school policy, which also applies to the Early Years Foundation Stage.

## POLICY AMENDMENT PAGE

Date	Key Amendments	Version Number	Reviewed by
15/6/2022	Annual Review with KCSIE 2022 updates, Chris Sanderson, Director of School Compliance and Policy	v5.0	CMS
5/3/2023	Short Review with updates, Chris Sanderson, Director of School Compliance and Policy	v5.1	CMS
24/6/2023	Policy updated for KCSIE 2023	v6.0	CMS
15/08/2023	Updated personnel for CS & Governance	v6.1	VT
08/02/2024	Addition of paragraph to explicitly list the details about each child recorded on their registration with the school.	v6.2	AMG
19/03/2024	Addition of 'other devices' to photographic rules p45 and p96. Addition of paragraph in relation to pupils over the age of 18 but included in the school's DfE registration.	v6.3	AMG
01/06/2024	Policy updated for KCSIE 2024	v7.0	VT
23/08/2024	New link to KCSIE.	v7.1	AMG
26/08/2024	Change in Safeguarding personnel	v7.2	VT
16/12/2024	Legislation/ Well Being Manager Updates	v.7.3	VT
13/01/2025	Personnel updates.	v.7.4	VT
22/04/2025	Logo/ School Advisory Board updates	v7.5	VT
01/09/2025	Updated to reflect KCSIE 2025 & annual updates	v.8	VT
01/04/2026	Updated to reflect changes in the Advisory Board and the updates to the Physical Restraint Policy (now named Use of Restrictive Interventions (including reasonable force and seclusion) Policy).	v8.1	VT

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## Safeguarding and Child Protection Policy

### Statement of Intent

- Chatsworth Schools (CS) are committed to Safeguarding, Child Protection and promoting the welfare of children and expect those working in the organisation and those connected with CS to share this commitment.
- CS want to work with children, parents and others connected with or supporting families to ensure the safety and protection of children, to promote their development and wellbeing and to give them the very best start in life.
- CS are committed to providing a supportive and controlled environment in which children and young people are encouraged to pursue high academic and personal goals as happy and secure individuals.
- Safeguarding is everyone’s responsibility and anyone can make a referral to children’s social care.
- Why do we need a safeguarding Policy?
  - children have a right to be safe
  - adults have a responsibility to safeguard and protect children
  - abuse is damaging and can affect the rest of a child's life
  - so children can grow up to be well-adjusted adults

Chatsworth Schools appoints a School Advisory Board consisting of an external advisor and internal Directors who provide the governance as listed below. They have an explicit duty to ensure safeguarding compliance, policy oversight and annual review. The Directors of Chatsworth Schools oversee the annual review of the school’s Safeguarding and Child Protection policies and procedures and each will be signed off by the designated lead or Head. Information can be found on the Chatsworth Schools website: [www.chatsworthschools.com](http://www.chatsworthschools.com)

Vivianne Thompson	Chair of School Advisory Board, Director of Education, Early Years and Safeguarding.
Nigel Lowson	Deputy Chair of School Advisory Board and Well-Being Support.
James Thompson	School Advisor, Chief Operating Officer; Advisor for Filtering, monitoring and IT Safety.
Jonathan Ritchie	School Advisor, Executive Director of Property & Development
Nick Rees	School Advisor, Director of Enhanced Learning: Primary Schools, Inspections, Special Educational Needs.

### INTRODUCTION A Whole School Approach

This policy applies to the whole school. Chatsworth Schools are committed to facilitating a whole school approach to safeguarding. This means ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of practice and policy development, enabling the school to operate with the best interests of the child at heart. The Chatsworth Schools Advisory Team and the school's leadership ensure that the child's wishes and feelings are considered when determining what action to take and what services to provide. The school seeks to ensure that systems are in place, are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The school fully recognises its Child Protection responsibilities within the broader context of safeguarding. We recognise that all staff, including volunteers, have a full and active part to play in protecting pupils from harm, including child-on-child abuse. Everyone who encounters children and their families and carers has a role to play in safeguarding children. All professionals should ensure that their approach is child centred: this means considering **at all times** what is in **the best interests of the child**. Staff members must raise any safeguarding concerns, including minor and low-level concerns, since these may form part of a bigger picture, with the appropriate safeguarding lead **immediately**.

This document uses the abbreviation LADO (local authority designated officer) throughout, to refer to the specific role of the designated officer employed by the local authority to manage and have oversight of allegations across the children's workforce. This term is used in order to distinguish between safeguarding leads in education who can also be referred to as 'designated' leads.

## WHOM TO CONTACT

For non-safeguarding concerns, please contact the child's Section Head/Tutor/Class teacher.

Concern about a child  
Elaine Giliomee - DSL  
Mobile: 075239 46781

Office No. 207

Katy Joiner Deputy DSL  
Jude Ing, Deputy DSL  
Charlotte Norman, Deputy DSL  
Sam Bell, Deputy DSL  
Gabby Parisi-Boyd Deputy DSL  
Mel Jennings, Deputy DSL  
Cam Daramy, Deputy DSL

Office No. 208  
Office No. 211  
Office No 211  
Office No 280  
Office No 211  
Office No 245  
Office No 242

The Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team (SLT). If, in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care:

Milton Keynes Initial Point of Contact (IPOC))

Office No 01908 255307  
01908 255307

Milton Keynes Multi-Agency Safeguarding Hub 'MASH Front Door

Office No 01908  
253169 or 01908  
253170

Additional external contact information is available in Appendix 11

### **Concern about a member of staff or member of senior management**

Katy Joiner, Head. 208 or Mobile No. 07919 567182

If absent; CS Group Safeguarding Advisor and Chair of Advisors, Viv Thompson, Tel: 07957207138

[vthompson@chatsworthschools.com](mailto:vthompson@chatsworthschools.com)

Secondary Contact Chief Operating Officer & School Advisor,  
James Thompson Tel: 07545 221922 [jthompson@chatsworthschools.com](mailto:jthompson@chatsworthschools.com)

or:

LADO: Ms Jo Clifford

Tel: (01908 254307 ) / 01908 254306

Email [LADO@milton-keynes.gov.uk](mailto:LADO@milton-keynes.gov.uk)

Concern about the Head

Chair of Governors, Vivianne Thompson (CS Group Safeguarding Governor) [Tel: 07957207138](tel:07957207138)

or

LADO: Ms Jo Clifford

Tel: (01908 254307 ) / 01908 254306

Email [LADO@milton-keynes.gov.uk](mailto:LADO@milton-keynes.gov.uk)

## **POLICY STATEMENT**

The school fully recognises its Child Protection responsibilities within the broader context of safeguarding. The school aims to provide an environment in which there are effective systems for promoting the welfare of all pupils in our care, from school security measures to our wide range of policies, including Health and Safety. This policy provides guidance for all who may come across Child Protection concerns within the context of their interaction with the school. It describes procedures that are in accordance with government guidance and refers to local inter-agency procedures put in place by local safeguarding partners. We recognise that all staff, including volunteers, have a full and active part to play in protecting pupils from harm.

This Policy is available to all parents, staff and volunteers on the school's website. A paper copy of this Policy is also available to parents, upon request, from the School Office.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- 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

We believe that our school provides a caring, positive, safe and stimulating environment in which pupils can learn, taking a child-centred approach and promoting the social, physical and emotional wellbeing of each pupil. Pupils are taught about safeguarding both on and offline, including how to adjust their behaviour to reduce risks, keep themselves safe and build resilience; and are made aware of this Policy through the PSHEE programme and other means of sharing information appropriate to their age and understanding, within a broad and balanced curriculum.

The school will raise child protection and safeguarding concerns with parents or carers at the earliest appropriate opportunity (unless to do so would put the child at risk of further harm), and work in partnership with them and other agencies to improve outcomes. Parental consent is not required for referrals to statutory agencies. Teachers recognise their professional safeguarding responsibilities, as defined in The Teachers' Standards 2021. All staff acknowledge that it is their duty to report child protection concerns to social care services and to assist in child protection enquiries to support children in need. Staff are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned, staff should always act in the best interests of the child.

This policy is written in accordance with all current and updated legislation related to safeguarding in schools; the most recent edition of Keeping Children Safe in Education (KCSIE); the London Child Protection Procedures; Working Together to Safeguard Children; Information Sharing ; and *Safeguarding Handbook: Andrew Hall, Safeguarding in Schools*. All sources of information can be found in Appendix 9.

This policy has clear links to other policies in our school, in particular to any policies concerned with the protection of all children in the school from various kinds of harm. These policies include:

- Staff Code of Conduct Policy
- Code of Conduct for Pupils
- Behaviour Management
- Acceptable Use (ICT)

- Whistleblowing
- Anti-bullying
- Admissions and Equal Opportunities
- Health and Safety
- Looked After Children
- Mental Health and Well-being
- Missing Child/Uncollected Child
- Use of Restrictive Interventions (including reasonable force and seclusion) Policy
- Relationships and Sex Education
- Safer Recruitment
- Searching Screening and Confiscating Policy
- Single Central Register Policy
- Staff Induction Policy
- Visitors and Visiting Speakers Policy
- Vulnerable Staff Policy – Young Workers

Other key legislation and documents with which this policy is in line with are listed in Appendix 9 and include:

- The Education Acts
- Education (Independent Schools Standards) (England) Regulations 2014
- Preventing and Tackling Bullying July 201/ Prevent Duty guidance 2023
- DBS Code of Practice (Revised November 2015)
- The Counter Terrorism and Security Act 2015
- The Teachers' Standards 2012 (updated December 2021)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (updated July 2025)
- Designated staff have been appointed, including Early Years Foundation Stage (EYFS).

## **AIMS**

- To raise awareness of all school staff (and especially the Designated Safeguarding staff) of the need to protect all children from maltreatment and of responsibility in identifying and reporting possible cases of abuse in preventing impairment of children's mental and physical health or development
- To emphasise the need for good communication between all members of staff in matters relating to child protection
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse
- To provide a systematic means of monitoring pupils known or thought to be at risk of significant harm or where there are ongoing concerns
- To work openly and in partnership with parents in relation to child protection concerns

- To support all pupils' development in ways that will foster security, confidence and independence
- To promote safe practice and challenge poor and unsafe practice
- To further develop and promote effective working relationships with other agencies involved with safeguarding and promoting the welfare of children
- To ensure that **all** adults working within our school have been checked as to their suitability to work with children, in line with current guidance
- To integrate opportunities into the curriculum for children to develop the skills they need to recognise and stay safe from abuse, allowing for continuity and progression through the key stages with a strong emphasis on online safety
- To take account of and inform policy in related areas, such as anti-bullying; online safety; discipline and behaviour; health and safety; missing children; child sexual exploitation; child criminal exploitation, sexual violence and harassment; FGM; honour based abuse; anti-radicalisation; positive handling and physical intervention procedures; procedures for dealing with allegations against staff and recruitment practice.

**DEFINITIONS** *All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Types of Abuse and Neglect can be found in 'KCSIE' Part 1.*

### **What is Abuse?**

**Abuse** is a form of maltreatment of a child under 18 years. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse is broadly divided into four categories:- Neglect, Physical Injury, Sexual Abuse and Emotional Abuse. Brief definitions are given below. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy). Detailed guidance on recognising the indicators of possible abuse are attached as Appendix 1.

**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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Physical abuse** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (such as that previously known as Munchausen Syndrome by Proxy).

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and is covered elsewhere in our policy.

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

**Domestic Abuse** The Domestic Abuse Act 2021 introduced a new definition of domestic abuse, based on the previous cross-government definition of domestic violence. [Statutory guidance](#) on Domestic Abuse, July 2022, is now available for consultation for those working with domestic abuse victims and perpetrators, including those concerned with the impact on children. Domestic Abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. The Act defines domestic abuse as abusive behaviour which includes any of the following: *physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, emotional or other abuse* and is between parties who are both over the age of 16 **or** personally connected (the Act also provides a definition of 'personally connected').

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse – see below). This may all have a detrimental and long-term impact on their health, well-being, development, and ability to learn. It is important to recognise that many children will be living (or may have lived) in families where domestic abuse is a factor, and that these situations have a harmful impact on children emotionally and psychologically, as well as

placing them at risk of physical harm. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result. Children witnessing domestic abuse is recognised as 'significant harm' in law and can impact on children when they witness it at home and/or suffer it in an intimate personal relationship. Domestic abuse can also be a sign that children are suffering another type of abuse or neglect.

Domestic abuse may take the form of any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse. Types of abuse also include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Controlling Behaviour; a range of acts designed to make a person subordinate and/or dependent by; *isolating them from sources of support , exploiting them for personal gain, depriving them of the means needed for independence, resistance and escape, regulating their everyday behaviour*

Coercive Behaviour; *an act or a pattern of acts, assaults, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim*

Coercive Control; multiple behaviours and tactics which reinforce each other and are used to isolate, manipulate and regulate the victim. This pattern of abuse creates high levels of anxiety and fear and has a significant impact on children and young people: *as a victim in their own right, due to the impact the abuse has on the non-abusive parent, may also be forced to participate in the abusive behaviour*

The 2021 Act recognises the impact of domestic abuse on children, as victims in their own right. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, the school will follow its child safeguarding procedures and both young victims and young perpetrators will be offered support.

Behaviours such as alcohol and substance misuse, truancy and sexting put children at risk or in danger and safeguarding issues can manifest themselves via child-on-child abuse, including cyber-bullying and gender-based violence/sexual assaults.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children although does not replace statutory procedures. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day, enabling immediate support to be put in place, according to the child's needs. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. Further information on Operation Encompass is available [here](#).

## KEY PRINCIPLES

- We believe that all children have a right to be protected from harm and/or abuse in relation to both their mental and their physical health or development
- We recognise that abuse and neglect are complex issues and rarely stand-alone events and therefore require a culture of vigilance, professional curiosity and respectful challenge and effective recording and monitoring systems
- We recognise that abuse occurs in all cultures, religions and social classes and that staff need to be sensitive to the many differing factors which need to be taken into account depending on the child's cultural and social background when dealing with CP issues. However, we also recognise that the needs of the child are paramount, and any concerns will be referred on appropriately whatever the family background of the child concerned
- We recognise that because of the day-to-day contact with children, school staff are extremely well placed to observe outward signs of abuse
- We recognise that a child who is abused or witnesses abuse or violence may find it difficult to develop and maintain a sense of self-worth, they may feel helpless and humiliated and may feel self-blame
- We recognise that the school may provide the only stability in the lives of children who have been abused or are at risk of harm
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived as normal to that which is overtly aggressive, disturbed or withdrawn
- We know that it is important that children feel secure, are encouraged to talk and are sensitively listened to, and that children know that there are adults in school whom they can approach if they are worried or unhappy. We aim to reassure all who report a safeguarding concern or allegation that they are taken seriously and will be supported and kept safe. We ensure that they should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, and that they should never be made to feel ashamed for making a report
- We acknowledge that, although all designated staff have the skills and experience to respond to a variety of situations and issues, there may be occasions where it will be appropriate to consider whether specific or additional arrangements need to be put in place where an issue is particularly sensitive due to gender issues or cultural or faith issues. This ensures that in cases of sexual abuse in particular, a pupil can be spoken to by a same sex member of staff if this is felt to be appropriate
- We adhere to the principles of working in partnership with those who hold parental responsibility for each child
- The prime concern at all times must be the welfare and safety of the child. Where there is a conflict between the needs of the child and the parent/carer, the interests of the child must be paramount
- The ethos of the school supports open practice, good communication and a safe culture in which children can thrive and learn
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and know that these concerns will be taken seriously by the leadership team and dealt with sensitively and appropriately.

## ROLES AND RESPONSIBILITIES

**The Chatsworth Schools Directors and Advisors** The Chatsworth Schools Directors and Advisors carry out an annual review of the school's Safeguarding and Child Protection policy and procedures with day-to-day issues being delegated to the Head and the Designated Safeguarding Leads. The Directors are responsible for supporting the Heads and DSL's in;

- Reviewing the procedures for and the efficiency of our child protection duties
- Ensuring that any deficiencies or weaknesses in child protection arrangements are remedied without delay
- Approving amendments to child protection arrangements in the light of changing Regulations or recommended best practice and all staff undertake relevant training
- Ensuring the school has a child protection policy and procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is made available to parents on request
- Ensuring the school operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children
- Reviewing the procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures
- Ensuring that appropriate safeguarding arrangements are in place covering any hiring or rental arrangements for the school premises or facilities.

Chatsworth Schools ensures that Advisors and Directors receive appropriate safeguarding and child protection (including online) training, including at induction, to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the schools and nurseries are effective and support the delivery of a robust whole school approach to safeguarding. At least one director/ advisor undertakes basic cyber security training at least annually. Advisors' and directors' training is regularly updated.

Advisors and directors maintain an awareness of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and local multi-agency safeguarding arrangements. A summary of duties for schools and nurseries in this respect can be found in paragraphs 83 to 93 of KCSIE 2024 and are reflected in Chatsworth Schools policies, including the Admissions and Equal Opportunities Policy (Pupils), Equal Opportunities Policy (Staff), Curriculum Policy, SEND and Inclusion Policy, Anti-Bullying policy and the Accessibility Policy and Plan.

**The Safeguarding Advisor** Across the group of Chatsworth Schools and Nurseries, the group's Safeguarding Advisor provides support and challenge in safeguarding matters, including the following activities:

**Annually:** The Safeguarding Advisor receives either the local borough/council safeguarding submission from each school or nursery (if required) or, otherwise, the Chatsworth annual safeguarding audit form, each July, followed by a face-to-face review visit early in the Autumn, including a check of evidence, such as their safeguarding folders, a review of a selection of case notes and a check for appropriate safeguarding signage and visitor information. The annual review of the safeguarding policy is presented to the Autumn Advisors' meeting for approval.

**Termly:** The Safeguarding Advisor leads a DSL forum for the schools and nurseries covering up-to-date legislation, national issues and foci and providing for the sharing of good practice and experiences that benefit the teams. The Safeguarding Advisor presents a safeguarding report to the termly Advisors' meetings and leads discussion of any trends or major issues.

**In addition** the Safeguarding Advisor is available by phone or email (occasionally in person if deemed necessary) for advice, queries, help and support (including in the holiday periods) for the Heads and DSL's. She supports the schools and nurseries with submissions, referrals and associated paperwork. She reports to the central office and the CEO as to any major concerns.

**All Staff** The Teacher Standards state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. All staff have a responsibility to take appropriate action, working with other services as needed, and are aware of systems within the school which support safeguarding and guard against child-on-child abuse. Staff are advised of national and local guidance, and receive a mandatory induction to the school which covers, in particular:

- Part One of 'KCSIE' and Annex B. (Alternatively, staff who do not work directly with children may be asked to read Annex A, which is a summary version of Part One)
- This Safeguarding and Child Protection Policy, which includes the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies) and procedures for dealing with child-on-child abuse and the low level concerns process.
- Staff Code of Conduct/ Acceptable Use (ICT)/ Online Safety Policy and training, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Health and Safety policies and associated First Aid and Fire procedures, including evacuation procedures
- School policies, including the Whistleblowing, Behaviour Management, Anti-Bullying, Mental Health and Well-being and Admissions and Equal Opportunities (pupils) Policies
- The safeguarding response to children who have unexplainable and/or persistent absences from education (CAE)

Our Code of Conduct for Staff aims to ensure that members of staff do not compromise their position of trust in or outside of the school by inappropriate actions. All members of staff, both teaching and non-teaching, are aware of the importance of recognising signs of child abuse and are familiar with the correct procedures for communicating their concerns. They will ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil.

Responsibility for staff training lies with the Head, who provides induction and refresher training on staff days. A full training record can be seen in Appendix 8. It is vital that staff know what to look for, and what to do, if they are concerned about a child. It is school policy to follow the DfE guidance in 'KCSIE', ensuring that all members of staff have appropriate training in child protection issues. The Designated Safeguarding Leads undertake specific child protection and safeguarding courses, including 'inter-agency working', at least every two years, and attend relevant additional enhanced training courses to enable them to carry out their role effectively.

The DSL's and members of staff, including part-time and voluntary staff, have additional regular safeguarding training to supplement annual child protection training, under a rolling programme of topics, to provide them with relevant skills and knowledge to safeguard children.

Safer Recruitment training is available to all relevant staff who are involved in the recruitment process. Relevant Directors and Advisors have received Safer Recruitment training and every recruitment panel includes someone who has undertaken Safer Recruitment training. The school ensures that all staff are provided with the appropriate training in child protection and safeguarding issues, including Early Help processes, as recommended.

Child protection is taken very seriously, and all staff wear lanyards containing an identity card and an information insert which summarises the referral procedure if they have a safeguarding concern. All visitors wear a lanyard of a different colour to those worn by staff and receive an information leaflet, which provides them with relevant safeguarding information. During the school year, staff participate in questionnaires which provide an opportunity for them to contribute to, and shape, safeguarding arrangements and child protection policy.

All staff are aware of their roles and responsibilities and have signed a declaration (annual affirmation form) – to confirm that they have read and understand this policy; Part 1 & Annex B of KCSIE; and the Code of Conduct for Staff. All staff and all children (from KS2 upwards) also sign to state their adherence to the safety Acceptable Use (ICT) e-safety Policy which promotes safe social media use. All new staff will have the opportunity to discuss safeguarding requirements and this policy during their induction process. The children also adhere to their Code of Conduct for Pupils and the Behaviour Management Policy.

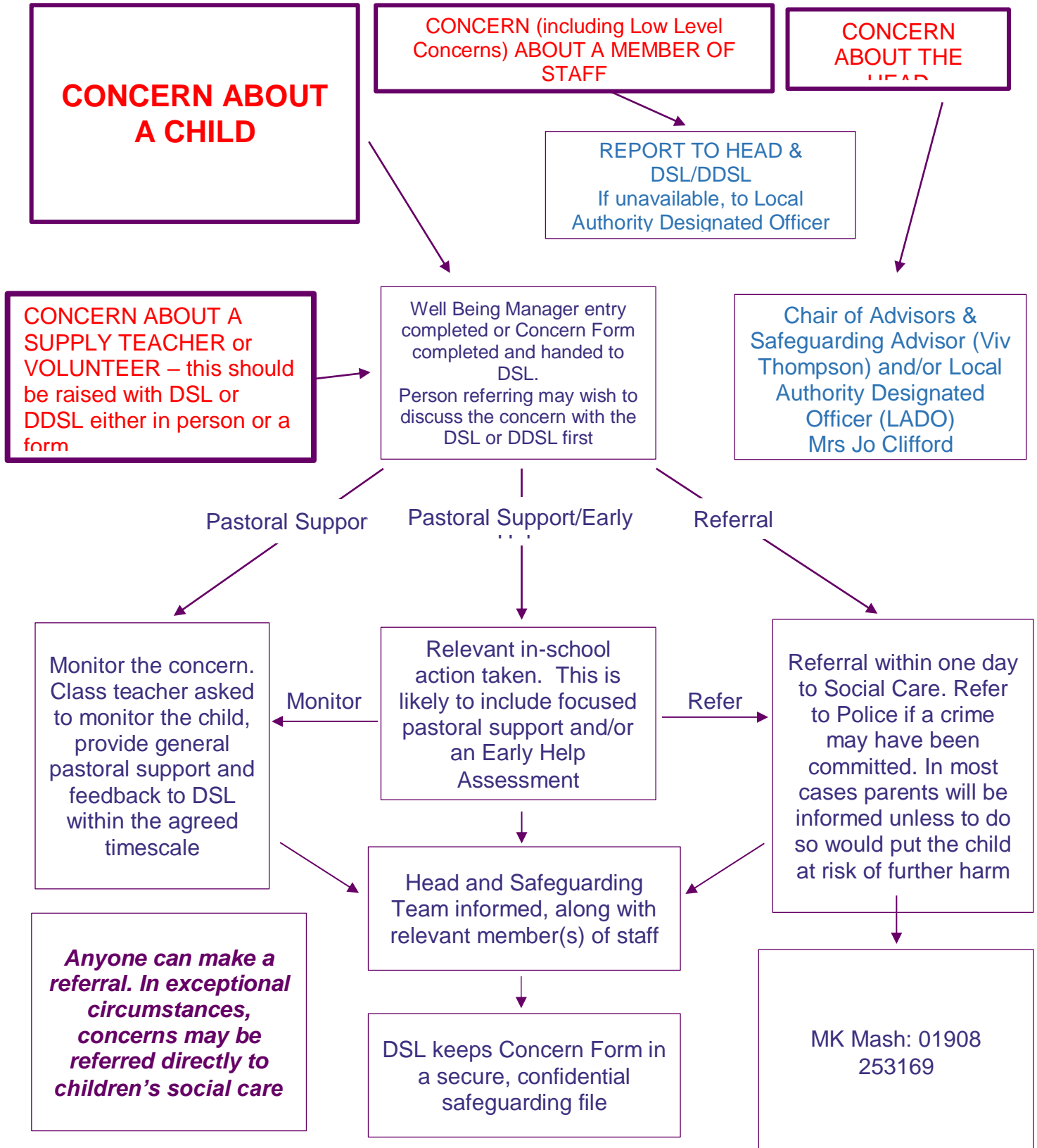
In addition to maintaining a safe recruitment culture, the school recognises its role in the prevention of harm to its pupils by providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The school community will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty
- Include in the curriculum opportunities that equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.

The School's Concerns Flowchart – inform your DSL of your concern then complete a concern form.

**FLOWCHART FOR RAISING SAFEGUARDING CONCERNS**



If serious concerns about immediate risk to a child exist or a child has suffered significant harm and continues to be at risk, Social Care Services for the authority in which the child lives should be contacted immediately - wherever possible with the support of the designated safeguarding lead or a deputy lead. If a child is in immediate danger or if a crime may have been committed, the police should also be contacted.

Staff members should ensure they are prepared for the referral with clear details of their concern and the child's name, date of birth, address and contact details for parents or carers. An Early Help assessment is not immediately required in these circumstances but should be provided within 48 hours.

*If a member of staff: suspects that child abuse is occurring, including suspicion of a child abusing a child, identifies child abuse, is concerned that school practices or the behaviour of others may be putting a child at risk of abuse, has an incident, complaint or suspicion reported to him/her;*

### **Responding to children**

- Immediately stop any other activity to listen. Accept what is being said without showing shock, or disbelief. Try to remain as calm as possible, particularly with the child
- Sometimes children make ambiguous statements and you may need to ensure understanding and obtain basic information. It is helpful to clarify what, if anything, the child is saying, and then, if appropriate who was involved, as well as when and where did the alleged harm take place. Do not ask leading questions and only prompt the child where necessary with open questions, such as where, when and what. Do not 'interview' the child in detail. You should avoid questions that could point the child towards giving a particular answer, as this may prejudice the investigation
- Be aware that children may sometimes not feel ready or know how to tell someone that they are being abused, exploited, or neglected. They may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or that they are being threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers. Staff will, nevertheless, have a professional curiosity and speak to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication. See also the section below on 'Children with Special Educational Needs and/or Disabilities (SEND)'.  
• Do not give guarantees of confidentiality but give assurances that only those who need to know will be informed; you have a duty to refer. Explain what you have to do next and who you have to talk to
- Ask the child if they have any questions or concerns
- All verbal conversations must be recorded in writing. A written record of the information must be put on Isams Well Being Manager or on a paper Concern form if access to Isams is not available, where possible in the child's own words stating when the alleged incident took place, who was present and what was said to have happened. See below for guidance on completing a Well Being Manager entry or a Concern Form. Sign and date the record. Ensure that these original notes are kept or uploaded to Isams.
- Do not feel anxious about submitting/completing a form; you should trust your instincts. You have a duty to record and raise concerns which, along with other reports possibly from

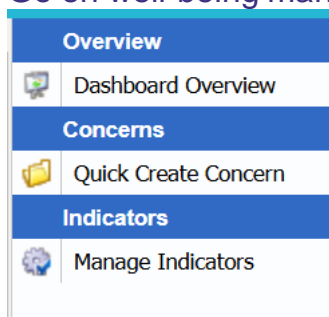
other members of staff, may help to build a picture of a situation

- The Concern Form is completed for any observation or incident that you believe may constitute a safeguarding concern. These should be passed to the DSL, who may be receiving them about the same child from others. The forms become a chronological record of evidence that supports a growing minor concern
- The Overview Grid provides a summary of evidence over time
- The Chronological Log is useful to note the concerns sequentially

**Guidance on completing a Concern on Isams.** It is important that child protection submissions are fully completed in a timely way. The details are important. To help the safeguarding team respond appropriately, please follow the guidance below:

**Creating a concern as a member of staff**

Go on well-being manager and click on quick create concern on the right hand side.



**Student:** The direct student involved.

**Date/time:** When and the time it happened.

**Staff member:** This is the name of the person reporting the concern. If you are putting this entry in on behalf of another member of staff, put their name.

**Location** (free text box): on-site or off-site. Did this incident take place at school or not on school premises?

**Category** (drop down):

- Well-being: not safeguarding related but related to the child.
- Safeguarding: specific issues relating to hot topics.
- Child protection: these mean a higher level of intervention and external agency involvement.
- Intervention: the child has received some in school support.

**Nature** (free text box): where did this concern arise

Well-being	Safeguarding	Child protection
Mental health	CSE	MASH
Medical	CAE	Early help
Behaviour	FGM	TAF
Appearance	Prevent	CIN
Home-life	Domestic violence	
Discrimination	Honour based violence	
Bereavement	Child on child	
Intervention	Neglect	
Bullying	Abuse	
Online	Self Harm	

Areas (drop down box):

This is the only optional part of entry. Suggestions for in-house use below:

- Source of information: email, conversation with parent/pupil etc.
- Subject: the lesson subject it is coming from.

**Details:** This should be entered in the students' words and be based on fact. No emotion should be included from the person entering the information. Only initials should be used to identify the people/person involved. This can include actions taken if the incident has already been actioned.

**Add additional students:** This is a yes or no. If a member of staff clicks yes, then they can add the student in the next step of the wizard and their role.

**Concern Role:** Subject (this is the default, the subject of the concern and not used for additional students), **Another Subject** (any additional person involved in the cause of the concern), Victim (the recipient, if applicable) and Witness (any person who was there or witnessed any part of the concern). These are important when creating parallel concerns, meaning they are recorded on multiple timelines.

For those wishing to raise a concern who do not have access to the Isams system please complete a paper concern form (see Appendix 2) and follow the guidance below.

- Enter all the administrative details neatly in pen, not pencil. **DO NOT** use initials. Include the name a child is known as, as well as their formal first and second name
- Include your full name (not initials)
- Make sure the concern or incident is described in detail, when appropriate, use a child's own words
- Don't report what other people have told you - they must complete their own forms
- Only write about one child on each Concern Form (use a separate form for each child)
- Remember that Concern Forms are used in court cases and inquests as primary documents, so they must be complete and accurate. Any rough notes taken while meeting with a child are also primary documents and should be retained and attached to the concern form.
- Make sure you use a Concern Form to record your concern and where necessary use a Body Chart form if appropriate – forms can be found in the appendices of this policy or from the school office.
- Complete a hard copy of the form. Do not email details of the concern. Emails get missed, go to the wrong person and cannot be signed. Email trails may be used as evidence. Confidentiality might be compromised if email systems are insecure
- Do not make any attempt to investigate the incident but inform the Designated Safeguarding Lead and/or the Head, as appropriate, immediately, unless the observation or incident would be a safeguarding concern only if it were repeated. When a child is describing pain or an injury, staff should not ask to see parts of the body which are normally covered up.
- Completed Concern Forms must be given to the relevant DSL or Head without delay (they may be delivered to a member of the reception or administration team and put in a sealed envelope to be passed to the DSL or Head at the earliest opportunity).

- Please alert the safeguarding team to concerns as soon as possible. It can take several hours to deal with even urgent concerns and the earlier we start the better
- ***Finally, please remember to sign, date and time all forms***

**These forms may be applicable to concerns, incidents or observations about staff as well as pupils.**

The Designated Safeguarding Leads will use the Chronological Log and Overview Grid, and other forms, for their own use.

***Record Keeping*** *The DSL(s) and staff must ensure that all concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing and uploaded to Isams. Hard copy information should be kept confidential and stored securely. Records should 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.

If a person reporting a concern is in doubt about recording requirements, he or she should discuss the matter with the DSL or DDSL.

***What will happen next?*** *DSL options include*

- managing any support for the child internally via the school's own pastoral support processes
- an Early Help assessment
- a referral for statutory services, for example if the child might be in need, is in need, or is suffering or likely to suffer harm

If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. The online tool 'Report child abuse to local council' directs to the relevant local children's social care contact number. If a child is in immediate danger the police should also be contacted. See flowchart below.

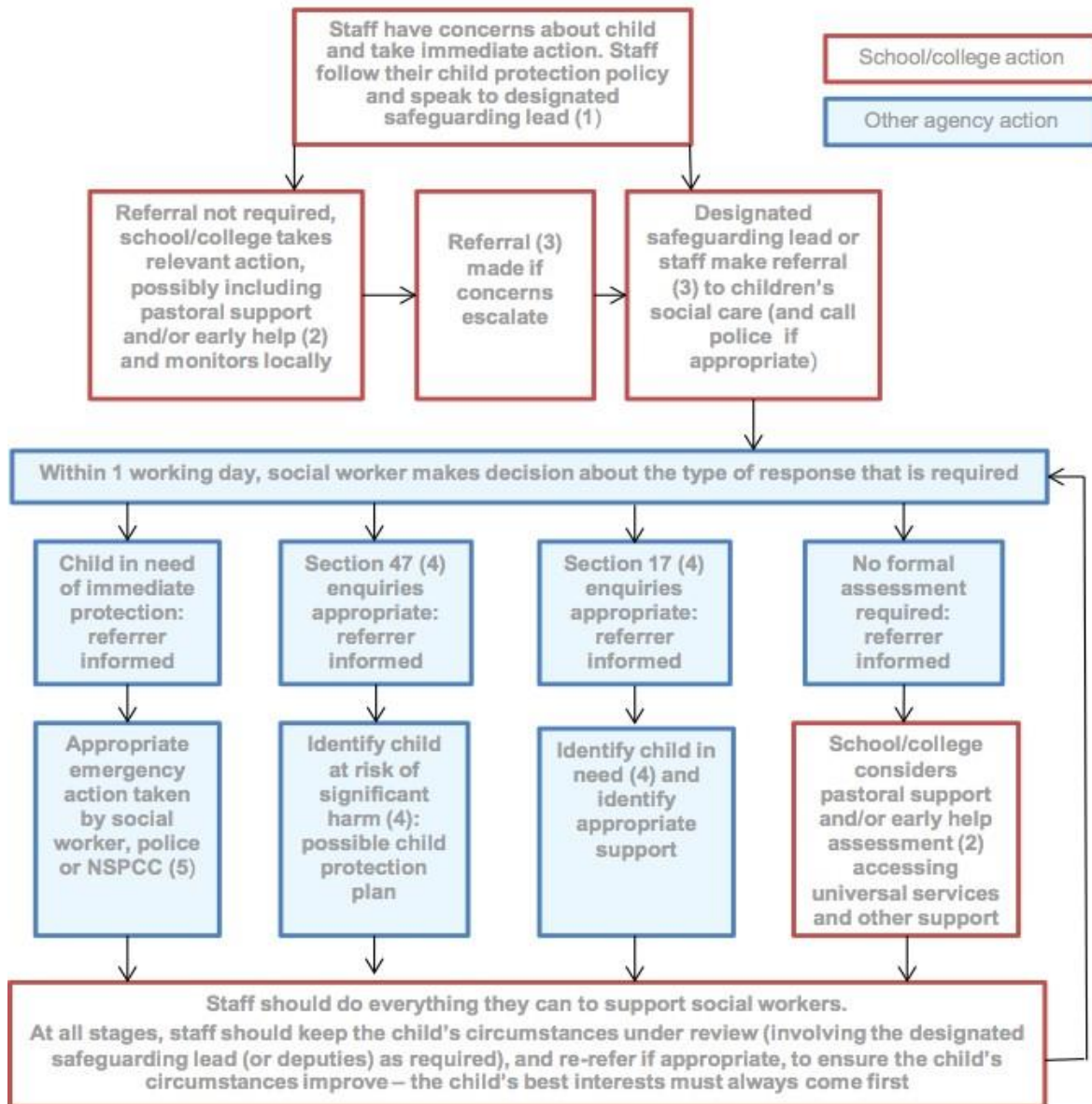
If anyone other than the designated safeguarding lead makes the referral, they should inform the designated safeguarding lead, as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

The Action Flowchart on the following page from KCSIE illustrates the statutory guidance.

## ACTION FLOWCHART FROM KCSIE

### Actions where there are concerns about a child



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

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

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

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

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

**Records and Monitoring** Well-kept records are essential to good child protection practice. All incidents relating to child protection must be recorded on the Isams Well Being Manager system or on the Child Protection safeguarding forms (See Appendix 2: Child Protection Safeguarding forms), together with any accompanying notes. Hard copies of paper forms must be given to the Designated Safeguarding Lead, who will ensure that a copy is kept securely. The Isams system and the Designated Safeguarding Lead will also ensure that details are given to any other person who needs to know about the particular child under threat, and who might be involved in the monitoring of that child. The DSL will also be responsible for liaising with any other agencies to which a referral might be warranted and will transfer the record on to a future school, obtaining a receipt from the receiving school. On admission to our school, enquiries are routinely made to a child's previous school to ensure that any relevant information is relayed to us. The school will also notify the relevant social care if there is an unexplained absence of more than two days of a pupil who is on the child protection register.

**Information Sharing** KCSIE makes it clear that the school has clear powers to share, hold and use information for safeguarding and child protection purposes. The school will be guided by the seven golden rules for information sharing, (from Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018).

Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

1. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
2. Seek advice from other practitioners, or your School Advisory Board, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
3. Where possible, share information with agreement, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without agreement if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
4. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
5. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
6. Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## ***Registration of Pupils***

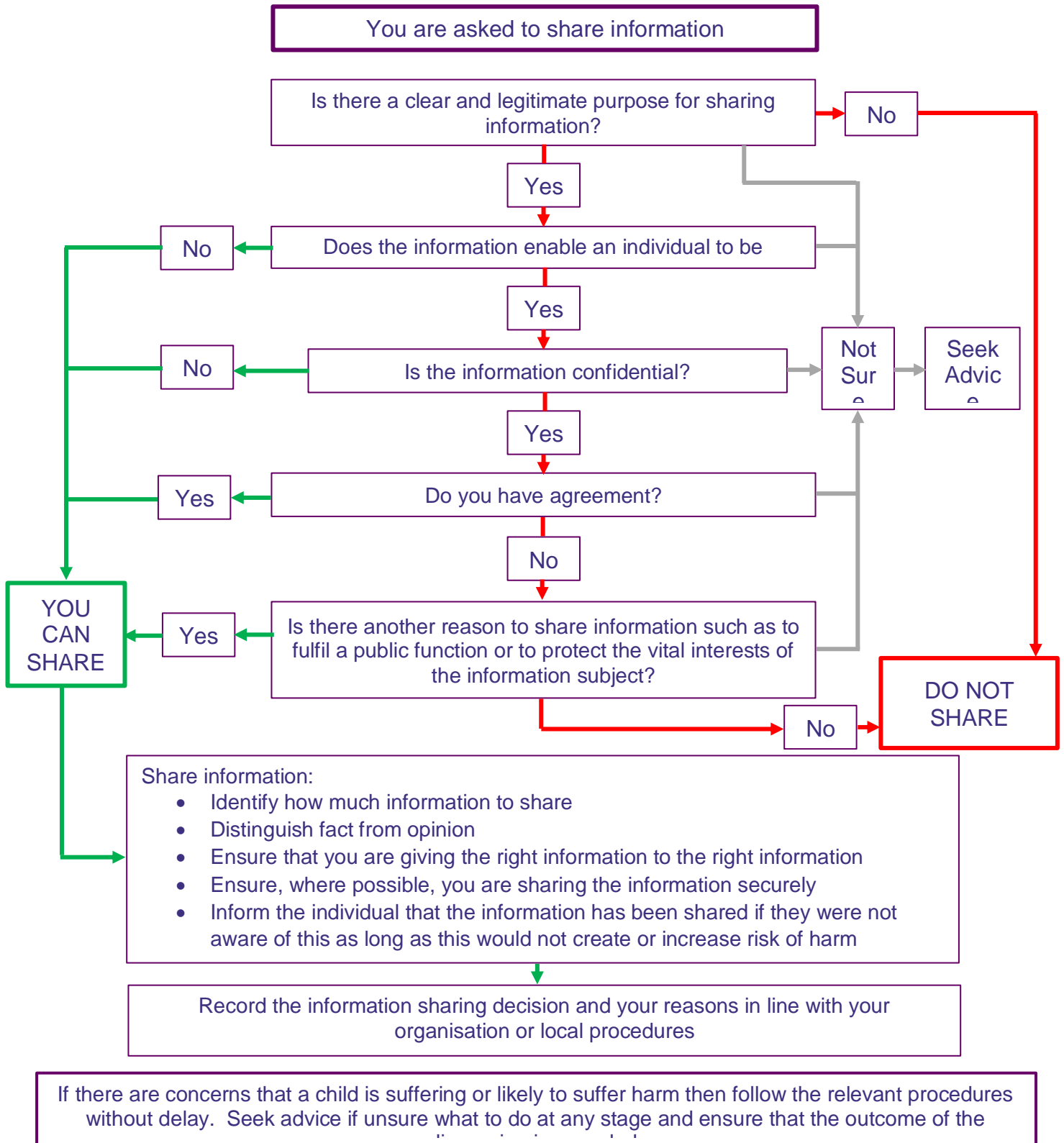
Attendance monitoring must comply with the statutory guidance 'Working Together to Improve School Attendance' (2024). Persistent absence is a safeguarding concern.

For each pupil, the admission register must contain:

- name in full;
- sex; this should be the birth sex unless the person has obtained a gender recognition certificate (not available under the age of 18);
- name and address of every person known to the proprietor to be a parent of the pupil (and an indication of which parent the pupil normally lives with and which parents hold parental responsibility as defined by Section 3 Children Act 1989) – NB parents holding parental responsibility, even if not actually caring for the child, have a right to receive relevant information from the school in respect of any pertinent matter affecting the child, unless a court order indicates otherwise;
- from September 2016, where a parent notifies a school that a pupil will live at another address, in addition or instead, the new address, the full name of the parent with whom the pupil will normally live in future and the date from which it is expected the pupil will normally live there, where it is reasonably practicable for the school to ascertain this information;
- at least one telephone number at which the parent with whom they normally live can be contacted in an emergency; (NB - schools must have one contact number to meet the registration standard and **more than one** to meet the safeguarding standard in paragraphs 7(a) and (b). They need not all be kept on the register);
- day, month and year of birth;
- day, month and year of admission or re-admission to the school;
- name and address of the school last attended, if any;
- an indication of boarding or day attendance (in schools which include boarders);
- from September 2016, the name of the destination school (or additional school, in the case of dual registration) notified by a parent and the first date of attendance, where it is reasonably practicable for the school to ascertain this information.

## INFORMATION SHARING FLOWCHART

(from Information Sharing: Advice for Practitioners July 2018):



## **ALLEGATIONS AGAINST STAFF**

### ***What school and college staff should do if they have concerns about another staff member, including supply staff, who may pose a risk of harm to children***

*We recognise that there will be occasions when a pupil at the school, or a parent or another person may have a concern about, or may make an allegation against, a member of staff (supply teacher or volunteer) who may have:*

- behaved in a way that has, or may have, harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children eg a transferable risk; an incident outside of school that did not involve children but could have an impact on their suitability to work with children such as an incident of domestic abuse.

### ***What school staff should do***

- Where a concern or allegation relates to a member of staff, including the Senior Management Team, the matter should be reported to the Head – these concerns should be recorded on a paper form following the same guidance as noted earlier in this policy and should NOT be uploaded to Isams.
- Concerns or allegations relating to the Head should go to the Chair of Advisors or the LADO and concerns around the proprietor should go directly to the LADO.

### ***The detailed Procedures for Managing Allegations against Staff, including supply staff, in Appendix 4 must be followed.***

This will always involve a discussion with Local Authority officers and a referral to the Local Authority Designated Officer (LADO) where appropriate. All staff are expected to recognise the need for absolute confidentiality in these situations.

### ***What school staff should do if they have concerns about safeguarding practices within the school***

The school recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should therefore be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.

The school reduces the likelihood of allegations against staff by ensuring that adults working in the school are clear about professional boundaries and act within them. The Staff Code of Conduct defines in detail the manner in which members of staff should carry out all aspects of their work at the school. The school has high expectations of all staff with regard to the treatment of children. The school has very specific and clearly defined principles and staff must believe in, adhere to and promote these principles. All staff have signed to state that they have read, understood and will abide by the Staff Code of Conduct.

All staff, supply staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime and know that such concerns will be taken seriously by the senior management team.

**Whistleblowing** Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistleblowing Policy. A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed

The school's Whistleblowing Policy is in place for such concerns to be raised with the school's senior leadership team. This policy is reflected in staff induction and training, and is also referred to in the School's Code of Conduct,

Where a staff member feels unable to raise an issue with the school, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing).
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school. Staff can call 0800 028 0285 – from 8am – 8 pm Mon-Fri, or 0808 800 5000, or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

**SPECIFIC SAFEGUARDING ISSUES Up-to-date guidance and practical support on specific safeguarding issues will be sought where necessary. See Appendix 9.**

The DSL will attend relevant training and ensure that staff are aware of issues such as Child Sexual Exploitation, Female Genital Mutilation, Illness Fabricated and Induced, Domestic Abuse, Honour-Based Abuse and other issues; understand the indicators; and recognise the complexities of these issues for children.

**Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** are forms of child abuse (as defined in KCSIE). They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity:

- in exchange for something the victim needs or wants
- for the financial advantage or increased status of the perpetrator or facilitator, and/or
- through violence or the threat of violence

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Male and female children are likely to have different experiences of CSE and CCE. These forms of harm often overlap with each other and other forms of abuse; perpetrators may subject children and young people to multiple forms of abuse.

Some of the indicators common to both CSE and CCE are where children:

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

Children who have been exploited will need additional support to help maintain them in education.

**Child Sexual Exploitation (CSE)** Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. The victim may have been sexually exploited even if the sexual activity appears consensual.

It involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Like all forms of child sexual abuse, child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited; they believe they are in a genuine romantic relationship.
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity (such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet).
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- May occur without the child or young person's immediate knowledge (through others copying videos or images of them on social media)
- Can be perpetrated by adult individuals or groups, males or females. Children may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim.
- The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- Is typified by some form of power imbalance in favour of those perpetrating the abuse.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: definition and guide for practitioners](#)

In this guidance, the government set out its ambitions to support vulnerable children to lead safe and positive lives, and to protect them from child sexual exploitation. Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm. We recognise that CSE is a form of child abuse involving criminal behaviours against children and young people which can have a long-lasting adverse impact on a child's physical and emotional health. Sexual exploitation may also be linked to child trafficking, in which case the National Referral Mechanism can offer additional specific guidance and support. The school addresses the risks of sexual exploitation in the PSHE, RE and RSE curriculum and through events and visiting speakers. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse. All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

**Child Criminal Exploitation (CCE)** Both boys and girls can be victims of CCE, although their experiences may be different and the indicators may not be the same. Boys and girls being criminally exploited may also be at higher risk of sexual exploitation.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines; see section below), forced to shoplift or pickpocket, or to threaten other young people.

Children can become trapped by this type of exploitation; perpetrators can threaten victims and their families with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised, particularly older children. They may then not be treated as victims despite the harm they have experienced.

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging',

where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism, a framework for identifying victims of human trafficking or modern slavery, should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

The indicators noted above, in relation to CSE and CCE, may also be indicators of children being involved in county lines. Additional specific indicators that children may be involved in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society, [County Lines Toolkit For Professionals](#).

**Child abduction and community safety incidents** Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to and from school on their own), the school provides practical advice on how to keep themselves safe. This includes outdoor-safety lessons run by staff and may include visits from local police or other relevant speakers. Such lessons focus on building children's confidence and abilities, rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

**School/ Staff response to unauthorised adults attempting to collect pupils.**

Schools should not allow children to go with any unauthorised person without first getting permission from parents or carers.

If a child's social worker is planning to collect them from school, this should be agreed in advance by the child's parents and carers.

If an unauthorised person arrives to collect the child, the school should contact the child's legal guardian. If the school is unable to make contact with the child's legal guardian, or the legal guardian does not give their permission, the school should explain that they are unable to release the child to anyone else without authorisation from the child's legal guardian.

**Children Who Go Missing from Home or Care** These children are particularly vulnerable and may be at significant risk at times. The immediate risks associated with going missing include:

- No means of support or legitimate income – leading to high-risk activities
- Involvement in criminal activities
- Victim of Abuse
- Victim of crime, for example through sexual assault and exploitation
- Alcohol/substance misuse
- Deterioration of physical and mental health
- Missing out on schooling and education
- Increased vulnerability

Longer-term risks include:

- Long-term drug dependency and/or alcohol dependency
- Crime

- Homelessness
- Disengagement from education
- Child sexual exploitation
- Poor physical and/or mental health.

### ***Children who are absent from Education (CAE, formerly Children Missing Education)***

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability and aptitude and any special educational needs they may have. A child being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

Knowing where children are during school hours is an extremely important aspect of safeguarding. We monitor attendance carefully and address poor or irregular attendance without delay. This response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging and where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. We will always follow up with parents/carers when pupils are not at school. We obtain at least two up-to-date contacts numbers for parents/carers. Parents are reminded to update the school as soon as possible if the numbers change.

In response to the guidance in [KCSIE](#), [Children Missing Education](#) and [Working together to improve school attendance](#), the school has:

1. Staff who understand what to do when children do not attend regularly.
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority. When a pupil leaves the school, we will record the name of the pupil's new school and their 1<sup>st</sup> day of attendance at the new school. The school provides information to the local authority when adding or removing a child from the school role at standard and non-standard transition points in line with Children Missing Education statutory guidance and the Government's missing children strategy. Education Welfare Services can provide advice. Local contact details can be found in Appendix 11.

The School remains responsible for safeguarding pupils in **alternative provision**. Written confirmation of safeguarding checks must be obtained from providers. Schools must know pupils' locations during school hours and review placements at least every half term.

**Emotionally Based School Refusal** Also known as School Refusal or School Phobia, this relates to young children with relatively mild separation anxiety, and more severe cases where a pupil misses weeks or months of school because of debilitating anxiety or depression. Sustained patterns of non-attendance over a period of time can also impact on an individual's opportunity for social interaction with peers, their self-esteem and mental health. As school refusal may have serious long-term social and educational consequences, the problem needs to be addressed promptly and firmly with a team approach that includes teachers, parents, administrators, support staff and in some cases, specialist medical and counselling practitioners. The school's procedure can be found within the Attendance Policy.

**Honour-based Abuse (HBA)** The terms 'honour crime' or 'honour-based abuse' or 'izzat' embrace a variety of crimes (mainly, but not exclusively, against women), including assault, imprisonment and murder where the person is being punished by their family or their community. They are being punished for actually, or allegedly, undermining what the family or community believes to be the correct code of behaviour.

Honour-based abuse (HBA) therefore encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. All forms of so called HBA are abuse, regardless of the motivation, and should be handled and escalated as such, by contacting the DSL as a matter of urgency. There are a range of potential indicators that a child may be at risk of HBA.

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage. Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place are:

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

- Prevented from going on to further/higher education

There have been occasions when women have presented with less common warning signs such as cut or shaved hair as a form of punishment for disobeying or perhaps ‘dishonouring’ her family. In some cases, a girl may report that she has been taken to a private practice to be examined to see if she is a virgin. There have been reports of women presenting in the NHS with symptoms associated with poisoning. In certain communities, it is considered important that women undergo female genital mutilation (FGM) before being able to marry – usually this will be performed during childhood, but there have been reports of young girls or young women undergoing FGM just before a forced marriage. Multi-agency statutory guidance for dealing with forced marriage can be found at [The right to choose: government guidance on forced marriage](#). Staff can contact the Forced Marriage Unit if they need advice or information:

Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

In February 2023 the legal age for marriage was raised to 18. Since this date, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before his or her eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM is discovered, teachers have a specific mandatory reporting duty, detailed below.

**Female Genital Mutilation (FGM)** Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a ‘special’ procedure to become a woman

**FGM Indicators** FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an ‘at-risk’ country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl’s return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear
- talking about pain or discomfort between her legs

**FGM is illegal in the UK and there is a mandatory duty on school staff who undertake ‘teaching work’ to report cases of FGM to the police.** The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children’s social care. The duty does not apply in relation to at risk or suspected cases. It will be rare for teachers to see visual evidence, and they should not be examining pupils. However, if staff have concerns that FGM has taken place they should consider and discuss any case of FGM with the Designated Safeguarding Lead and involve children’s social care as appropriate. Staff must personally report to the police, by calling 101, where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

**Radicalisation and The Prevent Duty** Schools have a duty to promote the spiritual, moral, social and cultural development of pupils and, within this, pupils are encouraged to respect specified fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Staff are reminded of the school’s legal duty to promote British values within the curriculum and are instructed to take every opportunity to do so as part of their teaching.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school’s core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society. The school works to promote tolerance and respect for diverse views, while challenging prejudice of any kind. We are an inclusive school which values citizenship and a sense of belonging. Teachers do not promote extremist views, or partisan political views, through their curriculum and/or teaching, and offer pupils a balanced presentation of views when political issues are brought to their attention, repelling radicalisation.

Pupils are encouraged to share their views and recognise that they are entitled to have different beliefs, but that these should not be used to influence others. We use the curriculum to ensure that children and young people recognise how people with extreme views try to radicalise others, especially through the use of the internet. We will ensure that children are safe from terrorist and extremist material when accessing the internet in school. Any visiting speakers are also suitably and appropriately supervised, in accordance with our Visitor Policy.

As part of the Counter Terrorism and Security Act 2015, schools have a specific duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'. Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school's safeguarding approach.

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The school supports the Prevent strategy, which works to prevent the growth of issues that create a climate which encourages radicalisation and extremism, which in turn can lead to acts of violence or terrorism. **Radicalisation** is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions. It is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. **Extremism** is defined as the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

All staff have undertaken Prevent Duty training. Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

### ***Recognising Extremism***

- Early indicators of radicalisation or extremism may include:
- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes

- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

As with all matters pertaining to the maintenance of a safeguarding culture within the school, staff are expected to be vigilant in identifying concerns and ensuring these are passed to the DSL without delay.

Staff should be alert to changes in a child's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL or Deputy making a Prevent referral.

Concerns will be discussed with the child's parents whenever possible and with the Local Authority Prevent co-ordinator. If appropriate, referrals will be made to the Channel panel. The panel will discuss the individual referred to determine whether they are susceptible to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. The Channel process has three objectives: to identify individuals at risk of being drawn into violent extremism; to assess the nature and extent of that risk; to develop the most appropriate support for the individuals concerned. This key element of the Prevent strategy adopts the multi-agency approach to protect people at risk from radicalisation, focussing on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism.

The school's Prevent Officers are the Designated Safeguarding Leads, who have completed the school risk assessment, attached in Appendix 6, to identify areas of potential risk from radicalisation at the school. The risk in the school is 'moderate to low' and the likelihood is 'low'. All staff and pupils are aware that the promotion of extreme political or religious ideology, whether directly or indirectly, is strictly forbidden at the school. Staff acknowledge the need for a culture of vigilance to be present in the school to support safeguarding.

Further [Channel Guidance](#) guidance is available and please refer to KCSIE for a definition of "Channel".

**Online Safety** The DSL has overall responsibility for monitoring the quality of the school's provision for Online Safety. For full details of the school's provision, please refer to the separate suite of Online Safety policies (Online Safety Policy, Acceptable Media Use and BYOD policy, Information Technology Policy, Mobile/Smart Phone Policy, Social Media Policy, Use of Photographic and Video Images Policy), which have been updated to reflect the areas of focus noted in KCSIE, summarising the areas of risk under the '4Cs' of Content, Contact, Conduct and Commerce.

**content:** *being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.*

**contact:** *being subjected to harmful online interaction with other users; for example: 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:** *online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying*

**and commerce:** *risks such as online gambling, inappropriate advertising, phishing and or financial scams.*

The school recognises that children and young people can be exploited and suffer bullying through their use of modern technology such as the internet, mobile phones and social networking sites. These policies explain how the school manages online safety on its premises.

All staff have received specific Online Safety training, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Staff training also includes times when children may be remote learning at home. Guidance about teaching online safety can be found in the DfE guidance; [Teaching Online Safety in Schools 2023](#).

**Remote Learning** In order to minimise the risks to our children, school staff are vigilant both when school computers are being used and when remote learning is in process and children are accessing 'online learning' whilst out of school, as directed in the Code of Conduct for Staff and the Acceptable Use (ICT) policy. The acceptable and unacceptable use of ICT based technology at the school and throughout remote learning is detailed. It includes policies on staff/pupil relationships and communications between them, specifically through social media. To ensure that they do not compromise their position, these policies clearly state that mobile phone or electronic communications with pupils at our school is not acceptable, with the exception of necessary use during remote learning via acceptable media such as Microsoft Teams and Google Classroom. Policies and procedures for remote learning take due account of the following guidance: DfE: [Providing Remote Education in Schools](#), DfE: [Safeguarding and Remote Education during Coronavirus](#) and NSPCC: [Undertaking remote teaching safely](#)

**Links with parents and carers:** Through its regular contact with parents and carers, the school reinforces the importance of children being safe online, both at school and at home. The school provides support to parents and carers to help them keep their children safe online away from school. This may include information in newsletters and periodic workshops in school or online. Parents and carers are made aware of what their children are being asked to do online, including the

sites they will be asked to access. They are also informed who from the school (if anyone) their child is going to be interacting with online.

**Filtering and Monitoring:** A firewall is operational in the school, and a valid subscription for filtering and monitoring is maintained. Information on filtering and monitoring is available to parents through the school's IT documentation. Filtering is designed to be effective in any language used in the school. A nominated Director/ Advisor has responsibility for filtering and monitoring. Further responsibilities, as outlined in the DfE guidance on [filtering and monitoring standards](#) are as follows:

**School Advisors:**

- acting reasonably to limit pupils' exposure to the risks associated with online access through the school's IT system and provide a safe environment in which to learn
- assuring themselves that filtering and monitoring procedures meet requirements
- reviewing the effectiveness of the school's filtering and monitoring systems
- ensuring that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively
- ensuring that the leadership team knows how to escalate concerns when identified
- considering the number of and age range of their pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.
- assigning a member of the senior leadership team and an advisor, to be responsible for ensuring that standards are met
- assigning the roles and responsibilities of staff and third parties, for example, external service providers
- discussing with IT staff and service providers what more needs to be done to support the school in meeting this standard.

**Senior Leadership Team:**

- procuring filtering and monitoring systems
- documenting decisions on what is blocked or allowed and why
- reviewing the effectiveness of your provision
- overseeing reports
- ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns
- work closely with School Advisors and Chatsworth Office staff, the DSL and IT service providers in all aspects of filtering and monitoring.

**The DSL**, taking lead responsibility for filtering and monitoring as part of the overall responsibility for safeguarding and online safety, oversees and acts on:

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

**The IT Service provider**, (both in-house and external):

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports
- completing actions following concerns or checks to systems
- working with the leadership team and DSL to procure systems, identify risk, carry out reviews and undertake checks

**All staff:**

- Undertaking training for their roles and responsibilities in relation to filtering and monitoring
- Engaging in effective monitoring strategies, as outlined below and as assigned by the school's leadership.
- Reporting if they see or suspect that unacceptable content has been accessed
- Reporting if, for example, through lesson planning and preparation they identify that unacceptable content can be accessed
- Reporting in advance if teaching content might cause a spike in filtering logs. (For example, drugs education)
- Reporting failure or abuse of the system
- Reporting any restrictions which are perceived to be unreasonable, including 'overblocking' which may impact on teaching and learning or the school's administration. Students should not be prevented from undertaking genuine research related to keeping safe or to their coursework
- Reporting any abbreviations, mis-spellings or slang terms (particularly newly-coined terms) which, when used in searches, may allow access to inappropriate content. Sometimes such terms are deliberately created in order to bypass filtering.

**Monitoring strategies** are informed by the school's filtering and monitoring reviews. A variety of strategies are deployed to minimise safeguarding risks on internet connected devices. These may include:

- physical monitoring by staff watching the screens of users
- live supervision by staff on a console with device management software
- network monitoring using log files of internet traffic and web access
- individual device monitoring through software or third-party services .

The school's provision and procedures for filtering and monitoring are reviewed at least annually and also if a safeguarding risk is identified, when there is a change in working practice, (such as remote access or BYOD) and when new technology is introduced. The review team will usually comprise a member of the Schools Advisory Board, a member of the leadership team, the DSL and a representative of the IT provider. The review includes checking pupils' browsing history. It is recorded and shared, as appropriate with School Advisors, Chatsworth Head Office, leadership and staff.

The review facilitates an understanding of:

- the risk profile of the pupils, including their age range and pupils with SEND or EAL
- what the filtering system currently blocks or allows and why
- any outside safeguarding influences, such as county lines
- any relevant safeguarding reports
- the digital resilience of the pupils
- teaching requirements, for example, for the RHSE and PSHE curriculum
- the specific use of the school's chosen technologies, including BYOD
- what related safeguarding or technology policies are in place

- what checks are currently taking place and how resulting actions are handled

The review is intended to inform:

- related safeguarding or technology policies and procedures
- roles and responsibilities
- training of staff
- curriculum and learning opportunities
- procurement decisions
- how often, and what is checked
- monitoring strategies

[South West Grid for Learning](#) and [London Grid for Learning](#) provide useful tools for undertaking an online safety audit of filtering and monitoring.

**Cyber Security:** the school ensures an appropriate level of security protection procedures to safeguard systems, staff and learners. The effectiveness of these procedures is reviewed periodically to keep up with evolving cyber-crime technologies. The school draws on guidance on e-security from the [National Education Network](#) and the government guidance, [Cyber security standards for schools and colleges](#) and the National Cyber Security Centre's guidance [Cyber security training for school staff](#).

The teaching of safeguarding, within and beyond the curriculum, includes the teaching of online safety to raise children's awareness of the issues and develop their capacity and resilience in dealing with them. The school has regard to the DfE guidance, produced in collaboration with UKCIS and the Samaritans, on [Harmful Online Challenges and Online Hoaxes](#), which includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support. The guidance defines a hoax as a deliberate lie, designed to seem truthful, and notes that online challenges generally involve users recording themselves taking a challenge, and then distributing the video through social media channels, inspiring or daring others to repeat the challenge.

**Mobile Phones:** The school has strict rules governing staff use of mobile phones, contained in the Code of Conduct for Staff:

1. Staff are not permitted to make/receive calls/texts during contact time with children. Emergency contact should be made via the school office
2. Staff using mobile telephones in non-contact, private time, must do so with consideration for others nearby
3. Staff should have their phones on silent or switched off and out of sight (e.g. in a drawer, handbag or pocket) during class time. Bluetooth functions should be off.
4. Mobile phones should not be used in a space where children are present (for example, classroom, playground)
5. Use of phones (including receiving/sending texts and emails) should be limited to non-contact time when no children are present e.g. in office areas, staff room, empty classrooms
6. It is also advised that staff securely protect access to functions of their phone.
7. Should there be exceptional circumstances (e.g. acutely sick relative), then staff should make the Head aware of this and can have their phone in case of having to receive an emergency call
8. Staff are not at any time permitted to use recording equipment on their mobile phones or

other electronic devices, for example: to take recordings of children, or sharing images. Legitimate recordings and photographs should be captured using school equipment such as cameras and iPads.

Where it is suspected that a child is at risk from internet abuse or cyber bullying, we will report our concerns to the appropriate agency. The school's Anti-Bullying Policy will also be adhered to. The school is conscious of potential child protection issues and of the need to protect children so that they are not exposed to potential harm, e.g. sexting and radicalisation. The school's Data Protection Policy also governs the correct use of images. KCSIE Annex D provides a selection of hyperlinks to useful documents relating to online safety.

***Children Who Abuse Other Children (Child-on-child Abuse)*** This section includes topics covered in KCSIE Part 5: Child-on-Child Sexual Violence and Sexual Harassment, which all staff who work with children are advised to read.

We recognise that children are capable of abusing their peers. Sexual violence and sexual harassment between children can occur between two children of any age and sex, from primary through to secondary. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Child-on-child abuse can take place at school, away from school and online. Such abuse is most likely to include, but may not be limited to:

- Bullying, including prejudice-based, discriminatory and cyberbullying (please refer also to the section on the Protected Characteristics in the anti-bullying policy)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- abuse within intimate personal relationships between peers
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (known as sexting or youth produced sexual imagery; for further information, see below)
- initiation/hazing type violence and rituals. This could include activities involving harassment, abuse or humiliation, used as a way of initiating a person into a group and may also include an online element.
- 'Upskirting', which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender, can be a victim.

Children should be free from harm by both adults and other pupils. Safeguarding training for staff, including familiarity with this policy, raises their awareness of the indicators of child-on-child abuse and identifies the procedures for reporting concerns, taking action and also the school's proactive measures to guard against such abuse taking place, for example, through assemblies and the school's PSHE and RSE curricula. Even if there are no reports, it does not

mean child-on-child abuse is not happening; it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should report them to the DSL or DDSL. The school's response to a report of sexual violence or sexual harassment is particularly important. It can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. The [Ofsted Review into Sexual Abuse in Schools and Colleges](#), recognises the enormity of child-on-child abuse and confirms the need for adults to better support young people so that they feel able to tell those who can help when they have been subjected to harmful behaviours. A commitment to respond to the review's recommendations for schools and colleges is included in the text of this section of the policy. The recommendations can be referred to in Appendix 12. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they know they will be supported and kept safe.

We work to minimise the risk of child-on-child abuse by challenging any behaviours which could be abusive in nature, and have developed procedures to minimise the risk of this. Methods include teaching the children to follow the ethos of the School; educating the children in PSHE; and reminding them of the behaviour expected, as detailed in our Pupil Code of Conduct and Behaviour Policy. Occasionally, allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation.

Children are actively encouraged to report all cases of abuse of any form whether about themselves or others through the well advertised means such as; form tutor, designated safeguarding team members, leaders and external support agencies such as Childline or NSPCC.

We recognise that there are different gender issues that can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. In relation to sexual abuse and sexual harassment, it is recognised that girls are more likely to be victims than boys, and boys more likely to be perpetrators. All child-on-child abuse is unacceptable and will be taken seriously. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

The school provides clear processes as to how victims, perpetrators and any other child affected by child-on-child abuse will be supported. We will investigate and deal with any allegations robustly by following our policy on Sexual Violence and Sexual Harassment, the Department for Education advice 'Sexual violence and sexual harassment between children'; UK Council for Internet Safety (UKCIS) Guidance; our related policies, including Anti-Bullying,

Acceptable Use (ICT), Behaviour Management and the Codes of Conduct; and by making referrals to social care, CAMHS and/or police as appropriate.

Where needed, risk assessments will be carried out and strategies put in place to protect the child who has suffered abuse and to offer them support. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion, drawing on the systems outlined in the school's policies.

In cases of '**sexting**' we follow guidance given to schools and colleges by the UKCIS, updated in December 2020: [Sharing nudes and semi-nudes: Advice for education settings](#). Sexting, or the 'sharing nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive, but children still need to know it is illegal. However, if it is non-consensual, it is illegal and abusive and must be reported to the DSL. To protect him or herself from allegations of viewing or sharing indecent images, and to promote the well-being of the victim, a member of staff must avoid viewing any images which may be classified as child pornography. Therefore, it is not expected that a member of staff has seen evidence of such an issue before reporting it to the next level. If a member of staff inadvertently views an indecent image, for his or her protection, this should be reported immediately to the Head. In respect of the sharing of imagery, reference should also be made to the school's policy on Screening, Searching and Confiscating.

It is important to be conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. Abusive behaviour can be displayed in a variety of ways and can consist of sexual abuse/activity; physical harm; emotional abuse and/or verbal abuse.

Behaviours such as alcohol and substance misuse, truanting and sexting put children at risk or in danger and safeguarding issues can manifest themselves via child-on-child abuse, including cyber-bullying and gender-based violence/sexual assaults.

### ***The school's response to a report of child-on-child abuse***

Abuse is abuse and the school takes a zero-tolerance approach. It must not be downplayed by passing it off as "banter", "just having a laugh", "boys will be boys" or "part of growing up". Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others. It is also important that the school understands the scale of harassment and abuse and does not downplay the seriousness of certain behaviours. Otherwise, a culture of unacceptable behaviours may develop, providing an unsafe environment which normalises abuse and results in children accepting it as normal and not coming forward to report it. The school will have a difficult balancing act to consider. On one hand they need to safeguard the victim (and the wider pupil/student body) and on the other hand maintain the alleged perpetrator's education and safeguarding support as appropriate and implement any disciplinary sanctions. The DSL (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response. Important considerations will include:

- the wishes of the victim in terms of how he or she wants to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be

given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This needs to be balanced with the school's duty and responsibilities to protect other children

- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed
- the ages and developmental stage of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and of well-known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra-familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

All concerns, discussions and decisions made, and the reasons for those decisions, relating to child-on-child abuse, including sexual violence and sexual harassment, are recorded in writing. Such records are reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed. Records are maintained in a format which facilitates their being made available to a school inspection team upon request. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it, in accordance with the behaviour policy.

Victims of sexual violence or sexual harassment may not talk about the whole picture immediately. In order to keep a dialogue open, the school will offer ongoing support, such as the provision of a designated trusted adult, such as a tutor or the DSL, who can talk to the child about his or her needs. So far as possible, the choice of a designated adult will be the child's. The school recognises that a victim may be traumatised and find it difficult in a normal classroom environment and, without isolating him or her, particularly from a supportive peer group, the school will take account of any need to withdraw from some lessons or activities. Such measures will be organised because the victim has requested them, rather than because it makes the situation easier for the school to manage. The school will provide a physical space to which a victim can withdraw. The victim may require ongoing professional support, in which case, the DSL will liaise with social care and other agencies to seek to provide this.

If the victim moves to another school (for any reason), the DSL will ensure that the new school is aware of any ongoing support needs. In addition to the UKCIS guidance on sharing nudes and semi-nudes, noted above, KCSIE provides links to further useful guidance relating to addressing such aspects of child-on-child abuse. These are as follows:

**The UK Safer Internet Centre** provides an online safety helpline for professionals at 0344 381 4772 and [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk). The helpline provides expert advice and support for school and college staff with regard to online safety issues

**Internet Watch Foundation:** If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the [Internet Watch Foundation \(IWF\)](#)

**Childline/IWF [Report Remove](#)** is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online

**[Thinkuknow](#)** from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online

**[LGFL 'Undressed'](#)** provides advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

**Serious Violence** All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime such as knife or gun crime and homicide. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE. A range of risk factors increase the likelihood of involvement in serious violence. These include;

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery.

Early intervention is about recognizing and responding to the indicators of potential vulnerability, providing early support that is effective. When a young person begins to show signs of exploitation or vulnerability to exploitation, and thus at increased risk from serious violence, we should be able to intervene as early as possible to help reduce the risk factors and increase the protective factors.

The following Home Office documents provide guidance to schools;

**[Preventing Youth Violence and Gang Involvement](#)**

**[Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)**

**Modern Slavery and the National Referral Mechanism** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance](#).

**Cybercrime** Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL or a DDSL should consider referring into the 'Cyber Choices' programme, a national police programme, supported by the Home Office and led by the National Crime Agency. It aims to intervene when young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to more positive use of their skills and interests. The programme does not currently cover cyber-enabled crime, nor other areas of concern, such as online bullying or general online safety. The following links provide additional advice:

[Cyber Choices](#)

[NPCC When to call the police guidance](#)

[National Cyber Security Centre](#)

**Bullying** Bullying is behaviour by an individual or group, usually repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

The school's policy on bullying is set out in our separate Anti-Bullying Policy, in line with the guidance 'Preventing and tackling bullying July 2017' and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

**Discrimination** As detailed in our Admissions and Equal Opportunities Policy, the school opposes discrimination against pupils or potential pupils on the basis of the following 'protected characteristics', as outlined in the Equality Act 2010:

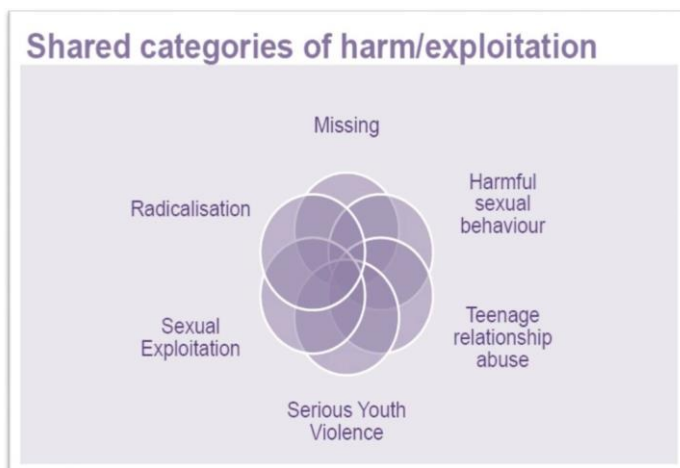
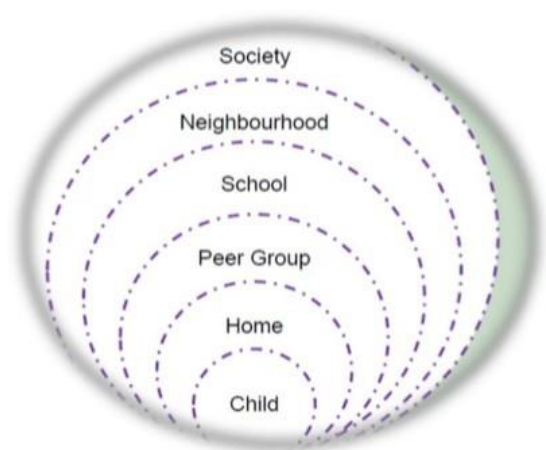
- race
- religion or belief
- sex
- sexual orientation
- disability
- gender reassignment

- pregnancy and maternity
- age
- marriage and civil partnership

### **Contextual Safeguarding**

Contextual Safeguarding expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts. All staff but especially designated safeguarding leads and deputies should consider whether children are at risk of abuse or exploitation in situations outside their families. When making a referral, the DSL must provide as much information as possible because children’s social care assessments should consider where children are being harmed in contexts outside the home. This will allow the consideration of all available information and enable a contextual approach to address such harm.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. Assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare.



*Building responses to peer-on-peer abuse: A toolkit for auditing local policy and practice, University of Bedfordshire, the International Centre Researching Child Sexual Exploitation, Violence and Trafficking*

### **Children with Special Educational Needs and/or Disabilities (SEND)**

Children and young people with special educational needs and disabilities can face additional safeguarding challenges.

- We recognise that children with SEND may be especially vulnerable to abuse and expect staff to take extra care to interpret apparent signs of abuse or neglect
- We recognise that additional barriers may exist for children with SEND due to possible lack of cognitive understanding, inability to understand the difference between fact and fiction online content resulting in repeating content or behaviours in school
- We will ensure assumptions are not made that indicators of abuse (such as behaviour, mood and injury) relate to the child's disability without further exploration
- We recognise that children with SEND or certain medical conditions are at higher risk of peer group isolation and can be disproportionately impacted by things like bullying without outwardly showing any signs.
- We recognise that difficulties may arise in overcoming communication barriers and managing or reporting these challenges.
- We will provide a school environment in which all pupils, including those with SEND, can feel confident and able to discuss their concerns, providing support with communication difficulties where needed, and differentiating appropriately
- The designated member of staff will work with the Chatsworth Director of Enhanced Learning, where necessary, to ensure that the needs of SEND pupils in relation to child protection issues are responded to appropriately (e.g. for a child with particular communication needs)

### ***Positive Handling, Physical Intervention and Physical Contact***

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. The school's **Use of Restrictive Interventions (including reasonable force and seclusion) Policy** will be followed, and incidents will be recorded on the incident form.

- Risk assessments will be carried out where individual pupils have additional needs or challenges that mean there is an increased likelihood of physical interventions being required and individual plans will be developed and shared/agreed with the parents/ carers.
- Physical intervention which causes injury or severe distress to a child may have to be considered under child protection or disciplinary procedures.
- Where a member of staff has had to use reasonable force, this should be reported to the headteacher immediately. If the headteacher has had to use reasonable force, this should be reported to the CS Directors & Chair of School Advisors, Viv Thompson.
- Following the use of reasonable force, the headteacher should inform the parents/carers as soon as is practicable.

All staff have completed training on the Use of Reasonable Force.

We operate a minimal touch policy (handshakes, high fives, fist bumps) at the school; we recognise that there are very rare occasions where physical touch is required at times such as administering first aid; comfort to a severely distressed child; preventing risk of immediate danger or physical threat; to physically restrain children about to harm themselves or others. Aside from such instances, it is not appropriate to use physical touch with children and young adults, and therefore we operate a no touch policy.

For those working within the very young in EYFS a certain amount of natural contact with children is expected to comfort or protect appropriately and within Key Stage 1 & 2 similarly, on occasion. However, the need for this diminishes considerably once pupils reach Key Stage 3 or for those with SEND or additional needs. Hence staff are expected to adhere to the no touch policy aside of the listed circumstances.

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

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. The DSL will lead in anticipating the potential for abuse and responding effectively as well as ensuring remedial interventions take place. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this Safeguarding and Child Protection policy and speaking to the DSL or DDSL.

- In order to help our pupils succeed, we recognise that the school plays an important role in supporting them to be resilient and mentally healthy
- We will ensure that pupils and their families are enabled to participate as fully as possible in decisions and are provided with information and support
- All staff have received mental health awareness training. We recognise that some children are more at risk of developing mental health problems than others. These risks can relate to the child, their family or to community and life events
- Risk factors are cumulative, and children exposed to multiple risks are more likely to develop behavioural or mental health problems
- Where severe problems occur, we will ensure that appropriate referrals are made (with consent) to specialist services (e.g. CYPMHS)

The department has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support Upper KS2 and secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. Formerly called 'Rise Above', it has now been branded [Every Mind Matters](#). See this website for links to all materials and lesson plans.

***Looked after children and previously looked after children*** Children who are looked after or who have been previously looked after are a particularly vulnerable group. The most common reason for children being looked after is as a result of abuse and/or neglect. The school will ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

In particular, the school will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the local authority.

The DSL, in their capacity as Designated Teacher for Looked After Children, will oversee LAC and PLAC children as well as the LAC or PLAC child's class teacher to ensure a personal education plan (PEP) is in place for them. The DSL should therefore have details of the child's social worker and the Local Authority Personal Advisor appointed to guide and support the care leaver and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

Local Authorities must appoint a 'Virtual Head' to have oversight responsibilities for the education and welfare of LACs and PLACs who attend maintained schools and academies. In this respect, they may not have any direct link with independent schools, though DSLs may come across them as part of their wider safeguarding duties and experience of training. Some Virtual Heads are happy to provide informal advice to DSLs in independent education. Since June 2021, the role of Virtual Head has extended to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. In this context, the school's DSL may have more formal contact with the Virtual Head.

***Private Fostering*** The school recognises that there is a mandatory duty to report to the local authority where a private fostering arrangement is known or suspected. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery. Once the notification has been made to the authority, Children's Services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carer's household. Children's services will then undertake a range of suitability checks

including DBS checks on everyone in the household over the age of 16. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

**Homelessness** Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Working Together to Safeguard Children (2023) now refers to the Homeless Reduction Act 2017 stressing that early intervention can help prevent children becoming homeless and avoid them being 'intentionally homeless' and so not owed a long-term housing duty. By being alert and aware of our pupils we can ensure early intervention to assist Social Care and Housing authorities working together to prevent 16-17 year olds from becoming homeless.

**Children and the Court System** The school recognises that children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate booklets for young witnesses available through the Gov Uk website offering guidance and support for children and young people: Ages 5-11-year olds: 'Going to Court', and 12-17 year olds: 'Going to Court and Being a Witness'.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

***Children who are lesbian, gay, bi, or trans (LGBT)*** The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, the school is alert to the fact that children who are LGBT can be targeted by other children. In some cases, children who are perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. The school is conscious that risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Staff endeavour, therefore, to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory Relationships and Sex Education and Health Education curriculum. The school has access to a range of support to counter homophobic, biphobic and transphobic bullying and abuse. For further details, please refer to the RSE policy, Anti-bullying Policy, Equality Policies, Gender Identity Policy and PSHE documentation.

***Children with family members in prison*** Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

***Children involved in paid performances, sports or modelling*** The child performance licensing and activities legislation (Child Performance & Activities licensing and Legislation in England, Feb 2015) sets out the arrangements that must be made to safeguard children when they take part in certain types of performances, paid sport or paid modelling. Staff should take note of this legislation if children under their care are involved in such paid activities.

### ***Use of the premises and facilities for non-school activities (hiring and rental arrangements)***

Should the school hire or rent out its premises or facilities to outside organisations (for example sports clubs, music groups and community groups), arrangements are put in place aiming to ensure that the school's pupils remain safeguarded. KCSIE makes it clear that these arrangements apply whether or not the children who attend any of these services or activities are children on the school roll. If services are provided on the premises by another body, the school ensures that assurance has been sought from the body responsible that appropriate safeguarding and child protection policies are in place and that arrangements are in place to liaise with the school on these matters, as appropriate. It is a requirement that hirers of the premises act in accordance with the new standards in the guidance [Keeping Children safe in out-of-school settings](#). The school will make arrangements to inspect the outside body's safeguarding and other arrangements periodically to verify this. In summary, the guidance notes that:

- hirers should appoint a DSL who has done safeguarding and child protection training
- children should know who the DSL is
- the hirer must be aware of the specific safeguarding issues that can put children at risk of harm and undertake appropriate training
- hirers must regularly review the performance and suitability of staff and volunteers after appointment.

The NSPCC guidance, [Keeping your child safe in sport](#) provides useful information in this respect. Similar guidance is available from other providers in respect of different types of activities. If the school receives an allegation about staff working for a hirer, using school premises to run activities for children, this safeguarding policy will be followed, including contacting the LADO.

The school ensures that safeguarding requirements are included in lease or hire agreements with outside bodies as a condition of use and occupation of the premises, and that failure to comply with this would lead to the termination of the agreement.

***Elective Home Education*** For some years it has been a requirement that schools report to the Local Authority the details of any pupil taken off roll, including when parents choose to home educate their child(ren). KCSIE now recommends that, where a parent/carer has expressed an intention to remove a child from school with a view to educating at home, Local Authorities, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

## EARLY INTERVENTION AND HELP

***What is Early Help? Early Help means providing extra help and support to children, young people and families as soon as problems start to emerge, using approaches that promote and strengthen resilience.***

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

The school aims to work with families in a supportive, non-judgemental way so that trust is built up and the best possible outcomes are achieved. Our Early Help support falls into three broad areas:

**General Pastoral Care** Most of the time children, young people and families go through life with little or no need for outside support, other than that provided by family members, friends and school. Our open-door policy allows parents to speak to a member of staff in person, on the telephone or via email. Children are able to speak to a member of staff if they have worries or concerns about themselves or their peers. This means that day-to-day issues that arise can be dealt with through our pastoral care system.

**Focused Pastoral Care** From time to time children, young people and families may experience difficulties which could escalate without the appropriate support. Focused Pastoral Care is likely to involve regular meetings between parents and/or the child and the child's Section Head, if a pupil at the Junior School, or the Senior Tutor, if a pupil at the Senior School, to discuss concerns and identify ways to improve the situation. The school may provide parents with details of external agencies who are better placed to provide the appropriate support, for example private counselling or the Child and Adolescent Mental Health Service (CYMPHS).

**Early Help Assessment** For children, young people and families whose circumstances make them more vulnerable, or where the school requires specialist support to meet a child's needs, an Early Help Assessment may be undertaken. An Early Help Assessment follows the Signs of Safety and Wellbeing model and provides support through a multi-agency approach. The school seeks to ensure that it is part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners are required to publish a local threshold document, which includes the process for the local early help assessment and the type and level of early help services to be provided. The DSL (and deputies) need to ensure familiarity with this document.

The school will always involve the family in all Early Help strategies and most will only be put in place with their permission. However, there may be occasions when the school's safeguarding team feel that a child may be at immediate risk of significant harm and that by informing the parents/carers of the concern the child may be put at further risk. If such a case should arise, the school will make an immediate referral to social care without the parents/carer's knowledge.

### ***What school staff should look out for***

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or exploitation

- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; has returned home to their family from care; is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is a privately fostered child.

## **CURRICULUM INPUT**

The school ensures that pupils are aware of safeguarding through:

- The content of the curriculum, which includes teaching about online safety, safe relationships and personal resilience.
- The school ethos, *The Spirit of the School*, which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- The school behaviour policy, which is aimed at supporting vulnerable pupils in the school.
- Liaison with other agencies that support the pupil such as Social Care, Child and Adult Mental Health Service, Education Welfare Service and Educational Psychology service, attending case conferences where necessary.
- Providing opportunities for feedback.

With regard to promoting safeguarding through the teaching of Relationships and Sex Education, the DfE has produced a 'one-stop' page on GOV.UK for teachers, which includes training modules on RHSE topics and further guidance. It can be accessed here: [Teaching about Relationships, Sex and Health](#). Links to other useful guidance and resources can be found in KCSIE.

## **EYFS Specific Curriculum and Welfare Requirements**

The Early Years Foundation Stage, Safeguarding and Welfare Requirements (2023, pages 22 sections 3.4 – 3.5, England only) state “all practitioners must be alert to any issues for concern in the child’s life at home or elsewhere. Providers must have and implement a policy and procedures to safeguard children.”

All staff should provide a safe, secure environment for learning and children will learn and thrive at their best when they are healthy, safe and secure, with their individual needs met.

All staff, but especially the Designated Safeguarding Lead and Deputies should ensure pupils are aware of safeguarding through:

- the implementation of the EYFS Prime areas which encourage young childrens awareness of the world around them, their place within it and what is right and wrong in relation to their behaviours and others behaviours towards them. It also refers to remaining healthy, hygienic and looking after their bodies as well as communicating their needs where possible
- within the EYFS there are many factors (delayed development, EAL, Speech and Language Difficulties etc) that may make a child less able to express themselves through speech and staff should be aware of these additional needs at all times when observing and caring for children, and use visual stimuli to support their learning and development.

This next paragraph applies only if the school has current registered EYFS provision (that is, children under the age of 2). The school will inform Ofsted of allegations against people living or working at the premises, or of any other abuse alleged to have taken place on the premises. This will be undertaken as soon as practicable and within 14 days at the latest.

## MULTI-AGENCY WORKING

New safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children. It is especially important that schools and colleges understand their role in the three safeguarding partner arrangements. Governing bodies, proprietors and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their local arrangements.

The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role they must set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement that the three safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need. The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements.

If named as a relevant agency, schools and colleges, in the same way as other relevant agencies, are under a statutory duty to co-operate with the published arrangements. For the list of relevant agencies see The Child Safeguarding Practice Review and Relevant Agency (England) Regulations 2018 available at [legislation.gov.uk](http://legislation.gov.uk). Governing bodies and proprietors should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners.

Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. All schools and colleges should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

## COMMUNICATION WITH PARENTS / CARERS

- We will ensure that all parents are informed that the school has a Safeguarding and Child Protection policy and is required to follow local social care guidelines in respect of reporting suspected abuse.
- Pupils and parents will be made aware of how the school's safeguarding system works and with whom they can discuss any concerns.
- Information will also be made available about any local and national telephone helplines.
- In individual cases, parents will be notified of the school's concerns at the earliest appropriate opportunity.

The Safeguarding and Child Protection Policy is published on the school website.

**THE CHILD'S WISHES** Where there is a safeguarding concern the school will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Guarantees of confidentiality cannot be given but we can give assurances that only those who need to know will be informed. Systems will be put in place for children to express their views and give feedback. Ultimately any systems and processes will operate with the best interests of the child at their heart.

**CONFIDENTIALITY** Members of staff have access to confidential, personal information in order to undertake their everyday responsibilities. This information must be handled responsibly and sensitively. It is important to:

- Avoid sharing information casually in conversation or other than on a need-to-know basis
- Avoid holding sensitive discussions about pupils in public areas, such as corridors, dining areas or playgrounds
- Keep notes and records about pupils suitably secure
- Be careful about personal information about pupils on view in staff rooms, work areas and offices, especially if these areas are used or visited by parents, visitors or contractors
- Ensure you are familiar with your responsibilities under Data Protection Regulations.

In areas where confidentiality may be an issue, it is important to remember that it is the welfare and safety of the pupil, which is the key focus.

Children need to be educated that other members of staff may have to pass information on to others in order to help them and keep them safe. In certain circumstances, it may also be the case that pupils themselves receive a disclosure and should understand the importance of passing such information on, and who to speak to. It is important to reassure pupils, including very young children, that if their personal information is shared it will only be passed on to those who need to know and will not become common knowledge amongst other staff/pupils. This can be brought to the attention of pupils through:

- PSHEE
- RHSE (The school has implemented updated provision and policy for Relationships and Sex Education.) Its introduction included due consultation with staff, parents and pupils)
- RS/RE discussions on ethical issues

- Assemblies
- Leaflets and other material telling pupils and parents about pastoral care arrangements
- Discussions with parents

It is essential that staff avoid being pressured into promising ‘secrecy’ when pupils give them information about changes in their family, their concerns, worries or other possible indications of abuse. The dangers of keeping secrets are that this approach:

- helps perpetuate the cycle of secrecy and concealment which characterises much abusive behaviour
- leads to the child feeling a greater sense of betrayal when material has to be disclosed, again reinforcing a sense that adults cannot be trusted
- will put the person who has promised secrecy in an impossible situation, for example, if the child then discloses evidence of extensive abuse or a situation in which a vulnerable sibling is clearly at risk of significant harm

We recognise that matters related to child protection are of a confidential nature. The designated member of staff/Head, as appropriate, will therefore share detailed information with other staff members on a need to know basis only. All staff must be aware that they have a professional responsibility to share information with the designated lead and with other relevant agencies where necessary to safeguard and promote the welfare of children. All staff must be aware that they cannot promise a child that they will keep certain information secret.

**SCHOOL SYSTEMS** Our school systems are in accordance with local safeguarding arrangements. Details of relevant guidance documents are provided in Appendix 8.

We will therefore ensure that

- We have a designated member of staff for each school who has received appropriate training and support for this role, including inter-agency working, in accordance with mandatory requirements and Local Safeguarding Partnership advice. This staff member has lead responsibility for all children in promoting their educational outcomes.
- We have additional members of staff who will act in the absence of the designated member of staff and have also received appropriate training for this role.
- We will ensure designated staff attend training and receive relevant updates every year
- All staff, including the head, are provided with training at induction and thereafter on a regular basis, not less than every three years, in line with Local Safeguarding Partnership advice, including safeguarding briefings and updates, at least annually. In summary, and as explained in the relevant sections of this policy, such training includes;
  - Prevent awareness
  - Mental health awareness
  - Online Safety
  - Risk Assessment
  - Use of reasonable force
  - Reporting of child-on-child sexual violence and sexual harassment
  - Awareness of the process for making referrals to children’s social care
  - Awareness of their role in the local early help process
  - Knowing what to do if a child tells a staff member he or she is being abused, exploited

- or neglected
- Knowing that they should reassure victims that they are being taken seriously, no matter how long it has taken them to come forward, and that they will be supported and kept safe, so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim will ever be made to feel ashamed for making a report.
- Knowing that abuse that occurs online or out of school should not be downplayed and should be treated equally seriously
- Knowing that it is important to explain to pupils that the law is in place to protect children and young people, rather than criminalise them, and that this needs to be explained in such a way that avoids alarming or distressing them.
- Every member of staff or volunteer knows the name of their designated safeguarding lead (DSL) and their role, their deputies (DDSLs) and what the back-up arrangements are if the DSL is unavailable
- All staff are familiar with the school's Safeguarding and Child Protection Policy as well as the Code of Conduct Policy and these issues are included in the induction for each new staff member
- All staff develop their understanding of signs and indicators of abuse and report any concerns to the designated lead but know that they can also refer direct to social care if needed
- We will ensure that all staff are aware of the importance of identifying any concerns about children at as early a stage as possible so that their needs can be identified and monitored and appropriate support put in place
- Enquiries will be made to the previous school of any new child to confirm that there were no safeguarding issues
- Where a pupil on the child protection register leaves, their information is transferred, confidentially, directly to the next school by the DSL under separate cover to general notes and progress reports to the new school immediately and that the school's DSL and child's social worker are informed. A receipt is obtained to confirm the safe arrival of information. Verbal contact with next school may be made so that the child can be supported immediately on arrival.
- We recognise that there is a variety of expertise within the staff team and will provide opportunities for staff to contribute to and shape safeguarding arrangements and policy
- We are aware of risks to children online and will ensure children are safeguarded in school from potentially harmful and inappropriate online material through appropriate filtering and monitoring systems
- When considering referrals to support agencies the school will act in accordance with Thresholds for Intervention guidance for the authority in which the child lives.
- All staff are aware that they should raise any concerns about colleagues or other adults with the Head. However, if the adult is a member of the Senior Management Team, concerns should be raised with the LADO.
- All staff know how to respond to a child who discloses abuse.
- All parents and/or carers are made aware of the responsibilities of staff members with regard to child protection procedures.
- We will refer any child believed to have suffered or to be likely to suffer significant harm to children's social care without delay, following up any such referral in writing within 48 hours
- We will ensure the immediate safety of any child felt to be at serious risk by taking appropriate action and by involving other relevant agencies as necessary

- We will develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters, including attendance at child protection case conferences wherever possible and providing reports as a matter of course (sample format attached as Appendix 7). We will contribute to multi-agency assessments of children's needs where appropriate and work in a fully integrated way with other relevant services as appropriate.
- If a child's situation does not appear to be improving, the school will take responsibility for finding out what is happening and keep pressing for action to be taken
- Written records are kept of all concerns, whether or not there is a need to refer the matter immediately, and that these records are kept securely, separate from the main pupil file, and in locked locations
- All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing.
- All staff members are made aware of the record keeping requirements and how they are expected to record any safeguarding concerns.
- The child's social worker is notified of any pupil subject to a Child Protection Plan who is absent from school without explanation for more than 2 days
- Any new concern or relevant information about a child subject to a Child Protection Plan will be passed to the child's allocated social worker without delay
- If a child subject to a Child Protection Plan leaves the school, records will be transferred to the new school without delay and the child's social worker informed of the change
- If school staff are unsure how to proceed in a potential Child Protection situation, or require advice, this will be appropriately sought via the DSL, Education Safeguarding Advisor, or the link social worker for the school, a duty social worker or directly from the safeguarding standards service. (Contact numbers listed in Appendix 11)
- In relation to pupils over the age of 18, they will be registered to the appropriate age limit for the pupils we admit and considered in all aspects of school life to be 'children' as per all other age groups in the school. They are not required to be DBS checked as we are registered for pupils up to the age of 21 by the DfE and as such can label all those registered in the school as 'children'.

## **SAFER RECRUITMENT**

The school follows its detailed Safer Recruitment Policy to ensure that all those working in the school in 'regulated activity', in either a paid or unpaid capacity, those not in regulated activity and visitors to the school are suitable to do so as far as can be reasonably ascertained. For full details of the school's procedures, please refer to the above policy. The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government has produced a 'Factual note on regulated activity in relation to children: scope'.

Summarised by the school's DBS provider, regulated activity in relation to children can be split into two main categories: activities and places of work.

Those working in specified activities will be classed as engaging in regulated activity. Put simply, this is anyone who is teaching, training, instructing, coaching, caring for or supervising children. Anyone engaged in personal or intimate care or supervising children overnight, whether or not this is supervised, is also considered to be in regulated activity. Anyone who is

carrying out such a role would most likely be eligible for an enhanced DBS check, with a children's barred list check.

Applicants would also be classed as working in regulated activity if they were working in a specified establishment. These are referred to as a limited range of establishments, and include, but are not limited to schools, children's homes and nurseries. Permanently working in these institutions would mean an applicant was engaging in regulated activity, e.g. those working as teachers, nursery nurses, or caretakers. For those who work in these establishments sporadically, such as contractors or photographers, their eligibility for a check would be determined by the frequency of their work. To be eligible for a DBS check they would need to work in any one of these specified places more than three times in a 30-day period. DBS checks on volunteers are free of charge. However, the company used by the school to obtain the check may levy an administration charge.

- It is school policy that all staff, regardless of their employment start date, have a satisfactory DBS Enhanced level certificate.
- Appropriate checks (i.e. against lists of prohibitions, sanctions and restrictions) will be carried out on all potential employees and volunteers (TRA Employer Access replaced with GOV.UK services for required checks, as outlined in KCSIE 2025).
- Risk assessments will be undertaken on all volunteers.
- All references will be taken up and verified
- At least one member of each interview panel will have completed Safer Recruitment training
- At interview, candidates will be asked to account for any gaps in their employment history.
- The school ensures that declarations are obtained to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009 and the Disqualification under the Childcare Act 2006 (Regulations amended September 2018). These regulations apply to staff providing early years childcare or later years childcare, including before school and after school wraparound provision, to children who have not attained the age of 8 and to those who are directly concerned in the management of that childcare.

Please refer also to these policies:

- Policy on the Recruitment of Ex-Offenders
- DBS Disclosure and Recruitment Policy (Appendix 8 of the Safer Recruitment Policy)
- Policy on the secure storage, handling, use, retention and disposal of Disclosure and Barring Service (DBS) certificates and certificate information (Appendix 7 of the Safer Recruitment Policy)

**SUPPORTING STAFF** The school recognises that staff working in the school who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting. The school will support such staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and will consider further support for Leads and other staff as appropriate. We will consider what arrangements can be made to provide supervision for designated leads and any other staff members as appropriate.

## REVIEWING PRACTICE

The Safeguarding and Child Protection Policy will be reviewed annually. At the conclusion of any case, whether the allegation is substantiated or not, the school will review its procedures and practice to help prevent similar events in the future.

### Interpretation

In this policy, the term “senior manager” means the School Head and their designated deputies.

This policy applies to all employees in all Schools (save for Schools with their own procedure which shall prevail) and other work environments within Chatsworth Schools.

This policy applies within all companies, which are wholly owned subsidiaries of Chatsworth Schools Ltd, a company registered in England, registered number 11552579.

The registered office of all companies is St Botolph Building, 138 Houndsditch, London, United Kingdom, EC3A 7AR Any enquiries regarding the application of this policy should be addressed to the Director of Education and Safeguarding at the above address.

This policy does not form part of any employee's contract of employment and may be amended at any time.

## APPENDIX 1

### RECOGNISING PHYSICAL ABUSE

Guidance with reference to the potential signs of abuse from London SCB procedures. The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents / carers are uninterested or undisturbed by an accident or an injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury).
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries.

**Bruising** Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

**Bite Marks** Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shape. Those over 3 cm in diameter are more likely to have been caused by an adult or an older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

**Burns and Scalds** It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)

- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation.

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

### ***Fractures***

Fractures may cause pain, swelling and discoloration over a bone or a joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life.

**Scars** A large number of scars or scars of different sizes or ages, or on different parts of body, may suggest abuse.

***Behavioural Indications*** Some children may behave in ways that alert you to the possibility of physical injury, for example

- Withdrawal from physical contact
- Fear of returning home
- Self-destructive tendencies
- Aggression towards others

### ***Recognising Emotional Abuse***

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent / carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others

- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' – difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self-harming
- Running away

### ***Recognising Neglect***

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from or late for school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Compulsive stealing or scavenging

### ***Recognising Sexual Abuse***

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt/fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child / family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate for the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder, self-mutilation and suicide attempts)
- Involvement in prostitution or indiscriminate choice of sexual partners

- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties)
- Concerning changes in behaviour or general presentation
- Regressive behaviour
- Distrust of a particular adult
- Unexplained gifts of money
- Sleep disturbances or nightmares
- Phobias or panic attacks.

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is disclosed
- Physical symptoms such as injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen in vagina, anus, external genitalia or clothing
- Wetting or soiling.

[The CSA Centre of Expertise on Child Sexual Abuse](#) has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

## APPENDIX 2

### CHILD PROTECTION FORMS

#### Concern Form

Please complete this form if you have any concerns about a pupil. This form can also be used for concerns about a member of staff. For non-safeguarding concerns, please contact your child's Senior Tutor or Section Head.

Child's Name				
Concern Day/Date/Time		Year/Class		
Member(s) of staff noting concern (Full name please – no initials)				
Concern (Please describe as fully as possible)				
Signature	Date and Time			
Would you like feedback about this concern?	Yes		No	
Name & Signature of person who provided the feedback where required;	Date:			
Action or outcome Update;	Date and by whom;			

/PLEASE PASS ON IMMEDIATELY TO DSL FOR CONCERN ABOUT A CHILD OR TO HEAD FOR CONCERN ABOUT A MEMBER OF STAFF

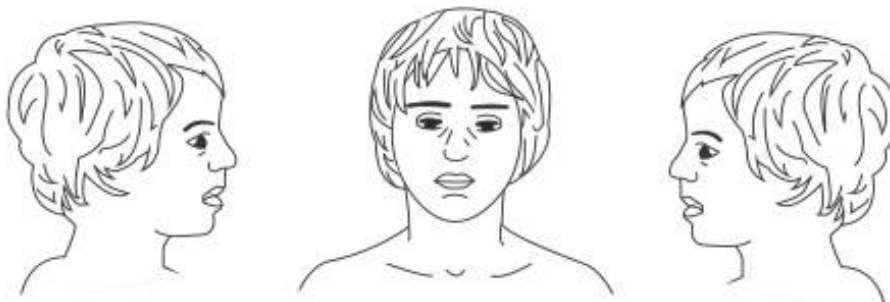
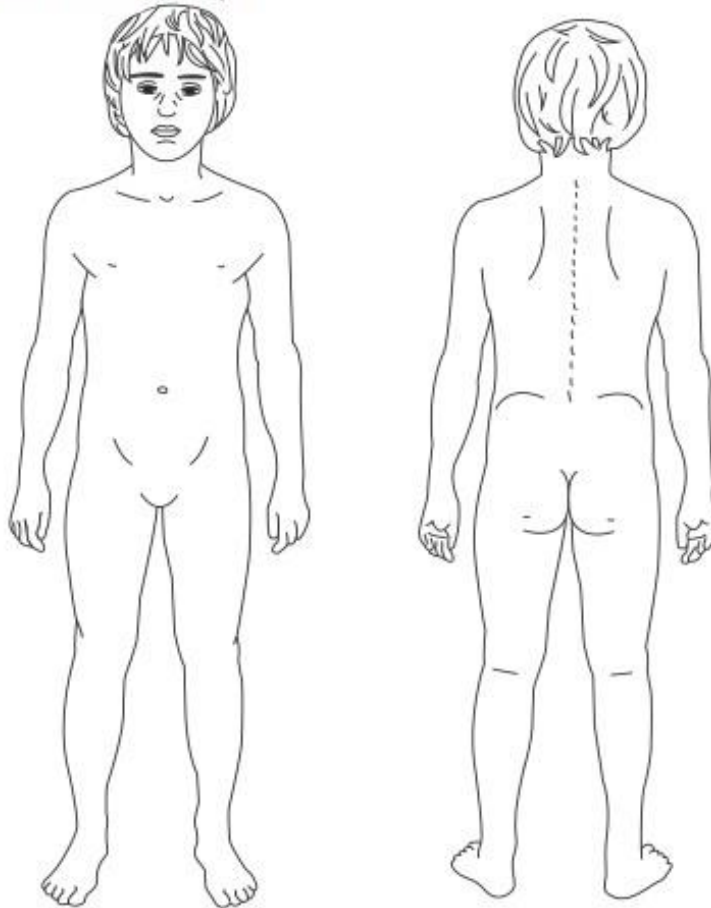
## BODY CHART

(do not ask to see parts of the body which are normally covered up)

This chart must be used together with the Concern Form or Incident or Observation Form.

Show clearly the location of your concern and label with a number and a brief description, eg. '1. Burn about 4cm.' On the Concern Form refer to the injury using the same number and description.

Child's Name \_\_\_\_\_



Observations made by \_\_\_\_\_ Signed \_\_\_\_\_ Date \_\_\_\_\_

Once completed attach this body chart to the relevant form





## APPENDIX 3

### ***Role of the designated safeguarding lead – From KCSIE***

Governing bodies, proprietors and management committees should ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. This should be explicit in the role holder's job description.

This person should have the appropriate status and authority within the school to carry out the duties of the post. The role of the DSL carries a significant responsibility and the postholder(s) should be given the additional time, funding, training, resources and support they need to carry out the role effectively. The additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

### ***Deputy Designated Safeguarding Leads (DDSLs)***

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated. DDSLs have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

The Deputy DSL's role may encompass two dimensions:

- Deputise for the DSL in the latter's absence, covering all areas of responsibility described in the DSL Role
- Lead on child protection responsibilities within a defined section of the school.
- The Deputy DSLs are trained to the same standard as the DSL

### ***Availability of DSLs***

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst, generally speaking, the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether, in exceptional circumstances, availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### ***Managing Referrals***

The DSL is expected to refer cases:

- of suspected abuse and neglect to the local authority children’s social care as required and support staff who make referrals to local authority children’s social care
- to the Channel Programme where there is a radicalisation concern as required and support staff who make referrals to the Channel Programme
- where a person is dismissed or has left due to risk/harm to a child, to the Disclosure and Barring Service as required and
- where a crime may have been committed to the Police as required. [NPCC When to call the police guidance](#) should help understand when to consider calling the police and what to expect when working with the police.

### ***Working with Others***

The DSL is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the head to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).
- as required, liaise with the “case manager” (as per Part 4) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, Senior Mental Health Leads and SENCOs on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically
- liaise with the Senior Mental Health Lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the head and relative strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school. This includes:
  - ensuring that the school knows who its cohort of children who have, or have had, a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and
  - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that

even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

### ***Information Sharing and Managing the Child Protection File***

The DSL is responsible for ensuring that child protection files are kept up to date – these will now be stored on Well Being Manager on Isams with access only for those concerned in the education and welfare of the individual named. Hard copies of paper forms should be shredded once they have been uploaded appropriately.

Where children leave the school (including in-year transfers), the DSL should ensure their child protection report drawn from Isams is transferred to the new school securely as soon as possible, and within five days for an in year transfer or within the first five days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as DSLs and SENCOs, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school. For example, information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### ***Raising Awareness***

The DSL should:

- Ensure each member of staff has access to, and understands, the safeguarding and child protection policy and procedures, especially new and part-time staff
- Ensure that the Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, working with the Chatsworth support office in this respect
- Ensure that the Safeguarding and Child Protection Policy is available publicly on the school's website, and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- Ensure that staff are kept informed of changes to the Safeguarding and Child Protection Policy and to the Safeguarding Procedures and to other relevant legislation and guidance, in particular KCSIE.
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- Complete an annual report, in conjunction with the Senior Management team, for Chatsworth Schools board.
- Help promote educational outcomes by sharing with school staff the information about the welfare, safeguarding and child protection issues that children who have, or have had, a

social worker are experiencing.

### ***Training, Knowledge and Skills***

The DSL (and any deputies) should undergo training, in line with Local Safeguarding Partnership advice, to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the DSL has in providing information and support to children's social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them eg School Council, Suggestion boxes, surveys, circle and form time conversations.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually to allow them to understand

and keep up with any developments relevant to their role.

### ***Providing Support to Staff***

Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

### ***Understanding the views of children***

It is important that children feel heard and understood. Therefore, DSLs should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings among all staff, and in any measures the school may put in place to protect them and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### ***Holding and sharing information***

The critical importance of recording, holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE, and therefore the DSL should be equipped to:

- understand the importance of information sharing, both within the school and with other schools and colleges on transfer, including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UKGDPR) and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping

### ***Preventing Radicalisation***

- In accordance with the *Prevent duty*, the DSL has the following responsibilities: Act as the first point of contact for parents, pupils, teaching and support staff and external agencies in all matters relating to the *Prevent Duty*
- Co-ordinate *Prevent Duty* procedures in the school
- Undergo appropriate training on the Channel programme
- Assess the training needs of all school staff in relation to the *Prevent Duty*, and implement and maintain an on-going training programme for staff including induction training for all newly appointed staff and volunteers; keeping records of such staff training

- Monitor the keeping, confidentiality and storage of records in relation to the *Prevent* Duty
- Liaise with local *Prevent* co-ordinators, the police and local authorities and existing multi-agency forums in all necessary or appropriate circumstances relating to the *Prevent* Duty.

## APPENDIX 4

Managing Allegations of Abuse against Staff, including supply staff, contractors, volunteers and anyone in a capacity such as student teacher, apprentice or work placement

All staff understand that if they receive an allegation that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity against another member of staff, or they have concerns about the behaviour of another member of staff, the matter should be reported **immediately** to the Head. The Disclosure and Barring Service harm test should be considered.

### ***The Harm Test***

A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm.

Harm is not defined in legislation. The DBS view harm as its common understanding or the definition you may find in a dictionary.

Harm is considered in its widest context and may include:

- sexual harm
- physical harm
- financial harm
- neglect
- emotional harm
- psychological harm
- verbal harm

KCSIE divides allegations into two categories;

- allegations that may meet the harm threshold
- allegations or concerns that do not meet the harm threshold, known as 'low level concerns'.

### ***1. Allegations that may meet the harm threshold***

This procedure will be used in respect of all cases where an allegation indicates that a person poses a risk of harm if he or she continues to work in his/her present position. It should be followed where it is alleged that a member of staff (including a volunteer, student, apprentice, person on supply or work placement and contractor) has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children. This will include cases of verbal abuse

- behaved or may have behaved in a way that indicates s/he may not be suitable to work with children.

There may be up to 3 strands in the consideration of an allegation:

- a police investigation of a possible criminal offence
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services
- consideration by the school of disciplinary action in respect of the individual.

The local authority referral procedure, which we adhere to, is in line with the Local Child Protection Procedures (LCPP), Part 4 of KCSIE and the statutory guidance 'Working together to safeguard children'. The school's complaints procedure will be followed, if relevant, alongside this policy.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

This guidance relates to members of staff and volunteers who are currently working in any school, regardless of whether the school is where the alleged abuse took place. Allegations against a teacher who is no longer teaching, or historical allegations of abuse, should be referred to the police.

***Procedure when receiving an allegation of abuse against staff - what school staff should do:***

- Where a concern or allegation relates to a member of staff, including those on the Senior Leadership Team but not including the Head, the matter should be reported to the Head. It is our policy that all allegations will be reported straight away to the Head who becomes the 'case manager'
- Safeguarding concerns or allegations relating to the Head must be taken to the Chair of the School Advisory Board and/or Safeguarding Advisor or directly to the LADO. If the allegation is reported to the Chair of Advisors or Safeguarding Advisor, this person will immediately contact the LADO. Allegation relating to the Head will be reported in this way without first informing the Head.
- Safeguarding concerns or allegations relating to the proprietor must be taken directly to the LADO. Staff may consider discussing any concerns with the school's DSL.
- If an allegation is made against a advisor, the school follows local procedures. Where an allegation is substantiated, Chatsworth Schools will follow the procedures to consider removing the advisor from office.
- Where there may be a conflict of interests in reporting the matter to the Head, it must be reported directly to the LADO. Staff may consider discussing any such concerns with the school's DSL.
- It is likely that any concerns or allegations relating to agency supply staff or third party employees will be managed by the school, since it will have access to information and

witnesses. However, the employer will be informed and remain involved, so that appropriate action can be taken and any patterns of inappropriate behaviour across different institutions can be identified.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The LADO should be informed of all allegations that come to the school's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate.

### ***Responding to an allegation or a complaint against staff from a child***

When an allegation has been made, there are two aspects to be considered;

- **Looking after the welfare of the child** – this is the overall responsibility of the DSL and action should be taken as set out in this policy
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

The person who receives the information regarding the allegation **will not question the child or investigate the matter any further**. That person will:

- Treat the matter seriously, avoid asking leading questions, communicate with the child in a manner appropriate to the child's understanding and communication style
- Make a written record of the information, where possible in the child's own words stating when the alleged incident took place, who was present and what was said to have happened
- Sign and date the record
- Report the matter immediately to the Head.

### ***Initial Action by the Head***

The Head will **not** investigate the matter by interviewing the accused, the child making the allegation or any of the potential witnesses. The Head should **not speak** to the member of staff who is the subject of the allegation at this point or commence an internal inquiry before consulting with the LADO.

It is the responsibility of the Police and the Children's Services to investigate allegations of abuse involving children. Any such intervention at this stage could jeopardise a potential criminal investigation. The Head may make basic enquiries to determine whether there may be some potential foundation to the allegation. The enquiries should be minimal to establish the facts of the allegation, if these were not established or were unclear at the time of the concern being raised, such as:

- Was the employee at work that day?
- Did the employee come into contact with the child?
- Have any other potential witnesses come forward?

The Head will:

- Countersign and date the written details provided of the allegation
- Record any other information about times, dates and location of any incident and the names of any potential witnesses
- Following confirmation that there is some potential foundation, the Head should seek the advice of the LADO **within one working day of the allegation being reported.**

Referral to the LADO will **not** be delayed in order to gather any further information. The LADO will consider the information and whether it meets the criteria for consultation with the police and social care.

The LADO will provide advice, guidance and help to determine whether a concern or allegation sits within the scope of safeguarding procedures. They have responsibility for ensuring the workforce is safe by managing allegations of abuse or misconduct of professionals working with children, offering advice and making referrals to the relevant bodies as appropriate

The initial sharing of information and evaluation may lead to a decision that no further action (i.e. suspension) is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.

In rare cases allegations will be so serious as to require immediate intervention by children's social work services and/or police. Other scenarios may seem much less serious and on the face of it will not warrant consideration of a police investigation, or enquiries by children's services. However, the school recognises that it is important that someone independent of the employer concerned examines them objectively. Investigations must be dealt with quickly, fairly and impartially.

If the school removes an individual (paid worker or unpaid volunteer) from work in regulated activity with children (or would have, had the person not left first) because the person poses a risk of harm to children, the school will make a referral to the Disclosure and Barring Service to consider whether to add the individual to the barred list. This applies irrespective of whether a referral has been made to local authority children's social care and/or the designated officer or team of officers. The school acknowledges that it is an offence to fail to make a referral without good reason.

KCSIE requires that the Headteacher or Head of Nursery (or, where the Headteacher or Head of Nursery is the subject of an allegation, the Chair of the School Advisory Board (for Chatsworth Schools, Advisors), or the chair of the management committee or proprietor of an independent school (the 'case manager')), should report the allegation immediately with the LADO. The purpose of this initial discussion is for the LADO and the case manager to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the

individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the LADO in order to help determine whether police involvement is necessary.

Where the initial discussion leads to no further action, the case manager and the LADO should;

- Record the decision and the justification for it
- Agree on what information should be put in writing to the individual concerned, and by whom.

### ***Informing Accused Person/Suspension***

The case manager should inform the accused person about the allegation as soon as possible after consulting the LADO. It is extremely important that the case manager provides them with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager should not do that until those agencies have been consulted and have agreed what information can be disclosed to the accused. Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance Working Together to Safeguard children. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour, under s.93 of the Education and Inspections Act 2006 and Use of Reasonable Force in Schools 2013.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the LADO should discuss the next steps with the case manager. In those circumstances, the options open to the school or college depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative.

### ***Supporting those involved***

Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

The case manager should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. For staff in maintained schools and colleges, that may include support via the local authority occupational health or employee welfare arrangements. Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

### ***Suspension***

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the case manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported; all options to avoid suspension should be considered prior to taking that step. If the case manager is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the LADO, children's social care or police. But suspension is highly unlikely to be justified on the basis of such concerns alone.

Suspension should be considered only in a case where there is cause to suspect a child or other children at the school is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or until the allegation is resolved and may wish to seek advice from their personnel adviser and the LADO. In cases where the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the school, immediate action should be taken to ensure the individual does not carry out work in

contravention of the order, i.e. pending the findings of the Teaching Regulation Agency TRA investigation, the individual must not carry out teaching work.

The case manager should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the LADO, police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension. Based on assessment of risk, the following alternatives should be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned
- providing an assistant to be present when the individual has contact with children
- redeploying to alternative work in the school so the individual does not have unsupervised access to children
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school site

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the LADO. This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the proprietor of the school, or governing bodies of the school who are the employers of staff at the school. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the LADO should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the school consideration of suspension. Police

involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment.

### ***Information Sharing***

In a strategy discussion or the initial evaluation of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible the employer should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case. Children's social care services should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

### ***Confidentiality***

It is extremely important that when an allegation is made, the school makes every effort to maintain absolute confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002. Legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public". This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for

example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted.)

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

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any information can be reasonably given to the wider community to reduce speculation
- how to manage press interest if and when it should arise.

### **Outcomes**

If the allegation is about physical contact, the strategy discussion or initial evaluation with the police will take account of the fact that school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour, under s.93 of the Education and Inspections Act 2006 and Use of Reasonable Force in Schools 2013

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The additional definition of 'unfounded' can be used to reflect cases where there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively they may not have been aware of all the circumstances.

In cases where a formal strategy discussion is not considered appropriate because the threshold of "significant harm" is not reached, but a police investigation might be needed, the Head will consult with the Designated Officer, police and any other agencies involved with the child to evaluate the allegation and decide how it should be dealt with. The police will be consulted about any case in which a criminal offence may have been committed.

The LADO and the Head may conclude that the complaint or allegation is such that it is clear that an investigation by police and/or enquiries by social care is not necessary. In these circumstances the school will be guided by the LADO as to the most appropriate action. The

options open to the school depend on the nature and circumstances of the allegation and the evidence and information available and will range from taking no further action to summary dismissal.

### ***Timescales***

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. Target timescales are shown below: the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation, but these targets should be achieved in all but truly exceptional cases. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the LADO. In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days. and subsequent procedures, as outlined in the Grievance and Disciplinary Procedure will be followed.

If, on conclusion of the case, it is decided that the person can return to work, the Head will consider how best to facilitate the return and provide relevant support to the staff member and consider how to best manage the person's contact with the child who made the allegation. Guidance can be provided from the Chatsworth Schools Advisory Team and the LADO. The parents/carers of the child will be kept fully informed of any decisions/action taken by the school.

### ***Resignations and "Compromise Agreements"***

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. **A referral to the DBS *must* be made, if the criteria are met.** Schools must also consider whether a referral to the Secretary of State, via the TRA for professional misconduct is appropriate, to consider prohibiting the individual from teaching. A 'Settlement' or 'Compromise' agreement, by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, must not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children.

There is a legal duty to refer if the following two conditions are met:

#### Condition 1

The school withdraws permission for a person to engage in regulated activity with children. Or the person is moved to another area of work that isn't regulated activity. This includes

situations when the above action would have been taken, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a pupil is first made.

### Condition 2

You think the person has carried out one of the following:

- engaged in relevant conduct in relation to children. An action or inaction has harmed a child or put them at risk of harm or;
- satisfied the harm test in relation to children. e.g. there has been no relevant conduct but a risk of harm to a child still exists.
- Or been cautioned or convicted of a relevant offence (automatic barring either with or without the right to make representations)

### ***Relevant conduct in relation to children***

A child is a person under 18 years of age. Relevant conduct is conduct which:

- endangers a child or is likely to endanger a child
- if repeated against or in relation to a child would endanger the child or be likely to endanger the child
- involves sexual material relating to children (including possession of such material)
- involves sexually explicit images depicting violence against human beings (including possession of such images)
- is of a sexual nature involving a child

A person's conduct endangers a child if they:

- harm a child
- cause a child to be harmed
- put a child at risk of harm
- attempt to harm a child
- incite another to harm a child

(See previous definition of The Harm Test)

### ***DBS Referral Procedure***

How to make a referral if there are concerns that an individual may have harmed a child, or put a child at risk of harm:

The Disclosure and Barring Service accepts referrals made online or by post, providing as much relevant information as possible:

Online: <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-a-referral>

Postal address: DBS Barring, PO Box 3963, Royal Wootton Bassett, SN4 4HH)

When a person has been referred, the DBS will consider if they need to be added to a barred list.

If the accused person resigns or their services cease to be used and the criteria are met it will not be appropriate to reach a settlement/compromise agreement. A settlement/compromise agreement which prevents the school from making a DBS referral when the criteria are met would likely result in a criminal offence being committed, as the school would not be complying with its legal duty to make the referral.

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

Furthermore, it will not override the statutory duty, previously referred to, to make a referral to the DBS for consideration where circumstances require that.

Where we cease to use the services of any person (staff member (including agency staff), peripatetic teacher, volunteer or any other person) or the person resigns or otherwise ceases to provide his or her services because it is considered that the person may be unsuitable to work with children, a referral will be made to the DBS promptly in accordance with our legal duty. In cases involving teaching staff, the school will also decide whether to refer the matter to the TRA to consider prohibiting the individual from teaching. Where required to do so, we will provide information requested by the DBS or TRA in respect of a member of staff or volunteer in accordance with our legal duty.

### ***Record Keeping***

Details of allegations that are found to have been malicious should be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide

clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. Records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. Further information can be found in the school's 'Retention of Records and Information Policy'. The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on record retention.

### ***Oversight and Monitoring***

The LADO has overall responsibility for oversight of the procedures for dealing with allegations; for resolving any inter-agency issues; and for liaison with multi agencies on the subject. The LADO will provide advice and guidance to the case manager, in addition to liaising with the police and other agencies and monitoring the progress of cases to ensure that they are dealt with thoroughly and fairly, as quickly as possible. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

### ***References***

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

### ***Specific actions following a criminal investigation or a prosecution***

The police should inform the school and LADO immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those circumstances, the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

### ***Action on Conclusion of a Case***

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the LADO should discuss with the case manager and their personnel adviser whether the school will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; and, in the case of a member of teaching staff at a school, whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

***There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.***

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school.

### ***In respect of malicious or unsubstantiated allegations***

If an allegation is determined to be unsubstantiated or malicious, the LADO should refer the matter to the children's social care services to determine whether the child concerned is in need of services or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the headteacher and/or Chatsworth Schools Advisory Team should consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil.

### ***Learning Lessons***

At the conclusion of a case in which an allegation *is* substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

## ***2. Concerns that do not meet the harm threshold - Low-level Concerns Process***

For full details, please refer to KCSIE, Part 4.

The school has policies and procedures in place for dealing with concerns, including allegations, which do not meet the harm threshold (as defined above). Such concerns may arise from a range of sources, including suspicion or complaint, or a disclosure from a child, a parent, a member of staff or another adult. A concern may also arise from the undertaking of vetting checks. The school will follow its procedures to identify, undertake and record any necessary action. Such procedures include, but are not limited to;

- complaints procedure
- staff code of conduct
- staff disciplinary and grievance procedures
- this policy

As part of its safeguarding procedures, the school promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. The term 'low-

level' does not mean that a concern is insignificant, but defines it as not meeting the 'harm threshold' as cited above. Such a concern, however small, may indicate that a member of staff, supply staff or a volunteer may have acted in a way that;

- is inconsistent with the staff code of conduct
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone or other devices;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language
- humiliating children.

Further examples of low-level concerns are identified in the staff code of conduct, which should be consulted for more detailed information. It is important that any such concerns are reported through the usual channels, to the Head or Nursery Manager and to the DSL. An adjustment to the guidance in KCSIE since 2022 notes that a low-level concern can now be shared initially with the DSL (or a nominated person (such as a values guardian/safeguarding champion)), or directly with the head. If the former, then the DSL should inform the head of all the low-level concerns in a timely fashion, according to the nature of each particular low-level concern. The head is the ultimate decision-maker in respect of all low-level concerns, although he or she is likely to choose to consult with the DSL and take a more collaborative decision-making approach. Refer to the reporting procedures above for cases where the concern relates to the Head/Nursery Manager or the DSL. Where low-level concerns are substantiated, the school will respond in a positive, sensitive and proportionate manner, undertaking any necessary action, including supporting the individual in correcting any unsuitable behaviour at an early stage.

If the head is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, he/she should consult with the LADO.

Any low-level concerns or allegations relating to agency supply staff or third party employees will also be reported to their employers so that appropriate action can be taken and any patterns of inappropriate behaviour across different institutions can be identified.

Details of low-level concerns or allegations will be recorded in writing, the record including the details and context of the concern, the person reporting the concern and any action taken. If the individual who reports the concern wishes to remain anonymous, this should be respected as far as reasonably possible. Records will be held securely and kept confidential, in line with data protection requirements. Records will be reviewed on a periodic basis so that any potential patterns or problematic or inappropriate behaviour can be identified. If such a pattern is identified, the school will decide what action should be taken, including consideration of whether to deal with the situation under part one of this procedure, above. Consideration will also be given to whether a pattern gives rise to any issues relating to the culture of the school, which will result in appropriate action being taken, including the provision of additional training, delivered to minimise the risk of recurrence. Records, including the rationale for all decisions and actions taken, will be retained in accordance with the school's retention of records and information policy, usually at least until the person leaves the school's employment. Details of

low-level concerns or allegations will not be included in references, since KCSIE notes that only substantiated safeguarding allegations should be mentioned in such a situation.

***Further notes on responding to a low-level concern or allegation***

This section of the policy serves as the school's Low-level Concerns Policy, and should be read in conjunction with the staff code of conduct, and other relevant school documentation. In responding to a low-level concern, the Head will

- speak directly to the person who raised the concern, unless it has been raised anonymously, or identified by the Head him/herself
- speak to the individual involved and any witnesses
- use the information to help categorise the behaviour which causes concern and determine what further action may be needed; implement such action
- keep a record, as detailed above, including the rationale for decisions and action taken.

## **APPENDIX 5**

### ***Code of Conduct for Staff***

This is published as a separate policy, “Code of Conduct Policy” for staff. Please refer to this document for full details.

**APPENDIX 6**

**Prevent Duty Risk Assessment – Risk of Pupils being drawn into Terrorism**

DATE ..... ASSESSOR ..... LOCATION  
.....

<b>DESCRIPTION OF POTENTIAL RISK AND INADEQUATE PROVISION</b>	<b>WHO IS AT RISK?</b>	<b>CATEGORY OF RISK High - 3 Medium - 2 Low -1</b>	<b>LIKELIHOOD High - 3 Medium - 2 Low -1</b>	<b>COMMENTS, ACTION TAKEN/ PLANNED</b>
Internal distribution of terrorist recruitment material	Pupils and staff	2	1	Vigilance of staff and pupil whistleblowing will make this unlikely. Notice to Parents/Staff
External distribution of terrorist recruitment material	Pupils and staff	2	1	Again, parent, pupil and staff vigilance will make this unlikely. Notice to Parents/Staff
Radicalisation through external speakers	Pupils and staff	1	1	External speakers must be approved by SMT making this very unlikely. Notice to Staff
Security of School Premises	Pupils and Staff	1	1	School boundaries are secure and provide little opportunity for radicalisation in school grounds

Access to radicalisation through internet use	Pupils and Staff	2	1	Potential danger of pupils and staff being influenced by personal, online activity. Internet filtering systems in place at both sites and Acceptable Use policy makes this unlikely, subject to effective software monitoring.
Use of school premises outside school hours	Pupils and Staff	1	1	Buildings only used in the knowledge of the SMT and for school related activities only
Direct or indirect reference to radicalisation by teaching staff	Pupils and Staff	1	1	Radicalisation or political indoctrination not permitted. Notice to Staff. Curriculum Policy
Staff Training	Pupils and Staff	1	1	To included awareness training, roles and responsibilities as they relate to the school's prevent duty
School Policies - Whistleblowing - Safeguarding - IT Acceptable use	Pupils and Staff	2	1	Reviewed annually. Special reference made to school's Prevent Duty. Role, responsibilities of staff, pupils and parents
School Curriculum	Pupils and Staff	1	1	Provide opportunities to reinforce dangers/ consequences of radicalisation & promote appropriate responses
Teaching of British Values	Pupils and Staff	1	1	Ensure proper teaching of British Values & the dangers of radicalisation to their adherence & retention

## APPENDIX 7

### Sample report to Child Protection Conference or Looked After Child Review

<b>School</b>	
<b>Name of Child</b>	
<b>Date of Birth</b>	
<b>Year Group</b>	
<b>Name of Class Teacher / Tutor / Head of Year</b>	
<p><i>When completing the sections below consider issues such as attendance and punctuality; preparation for school/learning; general appearance; emotional presentation and wellbeing; indicators that child may have suffered harm/be at risk of harm; disclosures made by child; behaviour and social development; relationships with peers and adults; academic progress/ areas requiring improvement; contact with family; etc</i></p>	
<p>What is working well?</p>	

What are we worried about?	
What needs to happen?	
Signature	
Print name	
Date	

***Reports should be shared with families prior to the meeting except in exceptional circumstances***

Please send this report wherever possible at least 48 hours in advance of the relevant meeting and bring copies for those attending the meeting.

## APPENDIX 8

### Safeguarding Training Record

**All staff:**

All staff receive termly safeguarding training from the DSL or an external provider. Safeguarding training is kept up to date via whole staff training during INSET and supplementary training via Educare. In addition, Educare training takes place yearly in Autumn term.

**Safeguarding Team (DSL/DDSLs):** Elaine Giliomee (DSL), Katy Joiner (DDSL), Charlotte Norman (DDSL), Jude Ing (DDSL), Gabby Parisi-Boyd (DDSL), Cam Daramy (DDSL), Mel Jennings (DDSL) and Sam Bell (DDSL) and have had appropriate training from safeguarding consultancy firms, supplemented by on-going local authority training.

#### Current Training

Name	Training Title	Date	Training Provider
Elaine Giliomee	Designated Safeguarding Lead	4 <sup>th</sup> November 2025	Acorn Training
Katy Joiner	Designated Safeguarding Lead	17 <sup>th</sup> September 2024	Acorn Training
Charlotte Norman	Designated Safeguarding Lead	10 <sup>th</sup> September 2025	Acorn Training
Jude Ing	Designated Safeguarding Lead	10 <sup>th</sup> September 2025	Acorn Training
Gabby Parisi-Boyd	DSL Refresher	13 <sup>th</sup> May 2025	Acorn Training
Cam Daramy	Designated Safeguarding Lead	4 <sup>th</sup> December 2025	Acorn Training

Mel Jennings	Designated Safeguarding Lead	4 <sup>th</sup> December 2025	Acorn Training
Sam Bell	Designated Safeguarding Lead	13 <sup>th</sup> October 2025	Acorn Training

## APPENDIX 9

*Further Information can be found in the following guidance:*

KCSIE 2025

Working together to Safeguard Children 2023

[https://assets.publishing.service.gov.uk/media/65cb4349a7ded0000c79e4e1/Working\\_together\\_to\\_safeguard\\_children\\_2023\\_-\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/media/65cb4349a7ded0000c79e4e1/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf)

EYFS 2024

[https://assets.publishing.service.gov.uk/media/65aa5e42ed27ca001327b2c7/EYFS\\_statutory\\_framework\\_for\\_group\\_and\\_school\\_based\\_providers.pdf](https://assets.publishing.service.gov.uk/media/65aa5e42ed27ca001327b2c7/EYFS_statutory_framework_for_group_and_school_based_providers.pdf)

Prevent 2023

<https://www.gov.uk/government/publications/prevent-duty-guidance>

### 1. Department for Education, Home Office and other Guidance

- [Care of unaccompanied migrant children and child victims of modern slavery](#)
- [Child performance and activities licensing legislation in England](#)
- [Child sexual exploitation: definition and guide for practitioners](#)
- [Children Act 1989: care planning, placement and case review](#) (updated July 2021)
- [Information sharing: advice for practitioners providing safeguarding services](#)
- [Keeping children safe in out-of-school settings](#)
- [Mandatory reporting of female genital mutilation: procedural information](#)
- [Meeting Digital and Technology Standards: March 2023: cyber security standards for schools and colleges](#)
- [Meeting Digital and Technology Standards March 2023: filtering and monitoring standards for schools and colleges](#)
- [Multi-agency statutory guidance on female genital mutilation](#) (Updated July 2020)
- [National action plan to tackle child abuse linked to faith or belief](#)
- [Non-Maintained Special Schools Regulations 2015](#)
- [Preventing and tackling bullying 2017](#)
- [Safeguarding strategy - unaccompanied asylum seeking and refugee children](#)
- [Statutory guidance on children who run away or go missing from home or care](#)
- [Teaching Online Safety in School 2023](#)
- [The Prevent duty: for schools and childcare providers](#)
- [Use of reasonable force in schools](#)
- [What to do if you're worried a child is being abused: advice for practitioners.](#)
- [Working together to improve school attendance](#)

### 2. Guidance issued by other Government Departments and Agencies

- [Advice to parents and carers on gangs](#) (Home Office)
- [Channel Duty guidance: Protecting vulnerable people from being drawn into terrorism](#) (Home Office)
- [County Lines: Criminal exploitation of children and vulnerable adults](#) (Home Office)

- [Cyber Aware](#) (National Cyber Security Centre)
- [Disclosure and Barring Service](#)
- [Domestic violence and abuse: Professional Guidance](#) (Department of Health & Social Care)
- [Female Genital Mutilation Protection Orders: factsheet](#) (Home Office)
- [FGM: Understanding the enhanced dataset: updated guidance](#) (Dept. of Health & Social Care)
- [Forced marriage](#) (Foreign & Commonwealth Office and Home Office)
- [Multi-agency practice guidelines: Handling cases of forced marriage](#) (FCO)
- [Missing Children and Adults - A Cross Government Strategy](#) (Home Office)
- [Modern Slavery: statutory guidance](#) (Home Office)
- [Preventing youth violence and gang involvement](#) (Home Office)
- [Thinkuknow \(Staying safe online\)](#)
- [Violence against women and girls](#) (Home Office)
- [Working with young people to prevent involvement in serious and organised crime](#) (Home Office)

### 3. Guidance issued by External Organisations

- [Child abuse and neglect guidance](#) (NICE)
- Child Sexual Abuse [www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns/](http://www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns/)
- [Child maltreatment: when to suspect maltreatment in under 18s](#) (NICE)
- [Child Protection and the Dental Team](#) (British Dental Association)
- [Cyberbullying: Understand, Prevent, Respond – Guidance for Schools](#) (Childnet International)
- [Good practice guidance on working with parents with a learning disability](#) (Working Together with Parents Network, University of Bristol)
- [Inter-parental relationships: conflicts and the impact of poverty](#) (Early Intervention Foundation)
- [Multi-agency practice principles for responding to child exploitation and extra-familial harm](#)
- [Private fostering](#) (Coram BAAF)
- Preventing Sexual Exploitation [www.childrensociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation](http://www.childrensociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation)
- Shore: support for around worrying sexual behaviour [www.lucyfaithfull.org.uk/shore/](http://www.lucyfaithfull.org.uk/shore/)
- [Standards for safeguarding and protecting children in sport](#) (NSPCC Child Protection in Sport Unit)
- [Whistleblowing advice line](#) (NSPCC)

## **APPENDIX 10**

### ***Additional guidance for schools on children who abuse other children***

#### ***Introduction***

Managing situations where children have been abused by other children can be complex and stressful. For the purpose of this document 'child' refers to any child or young person up to the age of 18 years.

It is important to be conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. Abusive behaviour can be displayed in a variety of ways and can consist of sexual abuse / activity; physical harm; emotional abuse, verbal abuse.

When dealing with such allegations, professionals should be mindful that there is significant research evidence to suggest that children who behave in a sexually inappropriate and / or aggressive way towards other children are often victims of abuse themselves.

There is also significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This must be considered throughout the planning stages of managing cases of abuse perpetrated by children.

Where an allegation is made regarding alleged abuse perpetrated by another child, the age and understanding of the alleged perpetrator must be considered throughout decision making.

The circumstances of the alleged perpetrator must be assessed separately from those of the alleged victim and must include exploration of why this behaviour has occurred.

The focus of involvement with the alleged perpetrator and their family will be both to determine risks to and from the child concerned within the parameters of the Children Act 1989, and to manage allegations against them within the criminal justice framework.

Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.

#### ***Process***

When an instance of child on child abuse comes to light, is disclosed or where there is evidence to indicate it has occurred, a referral should be made to children's social care in respect of both children concerned. The interests of the identified victim must always be the paramount consideration.

Where the allegation relates to an incident that took place within the school, or relates to pupils attending the same school the school should

- Keep the involved children separate during the school day while the investigation is taking place to avoid collusion or intimidation

- Having established what is alleged to have taken place, avoid talking to the children any further about the incident(s)
- Keep a detailed log of actions, discussions and decisions
- Carry out a risk assessment and put a risk management plan in place if necessary – ensure that non-teaching times are considered, especially times when pupils are moving around the school as the child who has been harmed may feel very vulnerable at such times
- Be aware that whether the incident(s) happened in school or elsewhere, other pupils may know what has happened (or is alleged to have happened). Other pupils may have been involved, either directly or indirectly. Other pupils may be judgemental or make unkind, or even threatening, comments
- Contact parents where possible (unless advised otherwise, or serious concern re further risk to child or in particularly complex situations e.g. sexual exploitation – in these instances seek advice)
- Consider whether the situation warrants information being shared with other parents in the school (e.g. where press coverage is likely) and seek advice.

The decision as to whether or not behaviour directed at another child should be categorised as harmful is clearly dependent on the individual circumstances of the case. It may be helpful to consider the following factors:

- The relative chronological and developmental age of the two children
- Whether the alleged abuser is supported or joined by other children
- Any differential in power or authority (e.g. related to race, gender, physical, emotional or intellectual vulnerability of victim)
- The actual behaviour (consider all factors)
- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation
- The degree of coercion, physical aggression, intimidation or bribery
- The victim's experience of the behaviour and the impact it is having on them
- Attempts to ensure secrecy
- Duration and frequency of behaviour.

In such cases the needs of each child should be separately considered by social care. In cases where a significant incident has occurred or the alleged incident is of a serious nature the usual process will involve a separate strategy meeting in respect of each child, and s47 enquiries initiated, which will involve discussion with police (CAIT). Different social workers should be allocated for the child who is the victim and the child who has harmed, even if they are living in the same household. Police will decide whether an alleged offence should be subject to criminal investigation.

If the investigation / assessment concludes that the allegations are substantiated, the children should not necessarily be expected to continue their education in contact with each other. The

child(ren) responsible for the abuse should be moved if necessary. The views and wishes of the child who has been abused and their parents should be appropriately considered in the decision making.

Once initial actions have been taken and processes are in place consideration should be given to the provision of ongoing support / counselling for the children involved, where appropriate / necessary.

Additional guidance is available via the London Child Protection procedures  
[http://www.londoncp.co.uk/chapters/ch\\_harm\\_others.html](http://www.londoncp.co.uk/chapters/ch_harm_others.html)

## APPENDIX 11

### CONTACT INFORMATION

DSL/DDSL:

Elaine Giliomee - Designated Office No. 207 or  
Safeguarding Lead 07523946781

Katy Joiner Deputy DSL Office No. 208

Jude Ing, Deputy DSL Office No. 211

Charlotte Norman, Deputy DSL Office No 211

Gabby Parisi-Boyd Deputy DSL Office No 211

Cam Daramy, Deputy DSL Office No 242

Mel Jennings, Deputy DSL Office No 245

Sam Bell, Deputy DSL Office No 280

**Primary Contact** Chatsworth Schools Group Safeguarding Advisor and Chair of Advisors,

Viv Thompson [Tel:07957 207138](tel:07957207138) [vthompson@chatsworthschools.com](mailto:vthompson@chatsworthschools.com)

**Secondary Contact** Director,

James Thompson [Tel: 07545 221922](tel:07545221922) [jthompson@chatsworthschools.com](mailto:jthompson@chatsworthschools.com)

### EXTERNAL CONTACT INFORMATION

Initial Point of Contact (IPOC): 01908 255307

Out of Hours Duty Service: 01908 265545

Safeguarding in Education Advisor – Call MK MASH (Number below) or MKSCB

Multi-Agency Safeguarding Hub (MASH) for MK: 01908 253169 or 253170

Out of Hours: 01908 265545

Email: [children@milton-keynes.gov.uk](mailto:children@milton-keynes.gov.uk)

Local Authority Designated Officers (LADO): Ms Jo Clifford (01908 254307 ) / 01908 254306

Email [LADO@milton-keynes.gov.uk](mailto:LADO@milton-keynes.gov.uk)

Police 0845 8505 505 or 101(Non emergency)  
or 999 (emergency)

## INSPECTORATES: OFSTED

The Office for the Standards in Education, Children's Services and Skills (OFSTED) is the body responsible for inspecting safeguarding & child protection issues in non-association independent schools:

Ofsted Head Office: Piccadilly Gate, Store Street, Manchester. M1 2WD.

Tel : 0300 123 1231

Email: [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)

Website : [www.ofsted.gov.uk](http://www.ofsted.gov.uk)

## INSPECTORATES: ISI

The Independent Schools Inspectorate is the body responsible for inspecting safeguarding & child protection issues in independent schools which are affiliated to one of the associations of independent schools.

ISI: CAP House, 9-12 Long Lane, London EC1A 9HA.

Tel: 0207 600 0100

Email: [concerns@isi.net](mailto:concerns@isi.net)

Website: [www.isi.net](http://www.isi.net)

## THE CHILDREN'S COMMISSIONER

The Children's Commissioner has a legal duty to promote and protect the rights of all children in England with a specific focus on children and young people with difficulties or challenges in their lives, and in particular those living away from home, in or leaving care, or receiving a social care service.

The Office of the Children's Commissioner: Children's Commissioner, Sanctuary Buildings, 20 Great Smith Street, London. SW1P 3BT Tel : 080 7783 8330

Children's Freephone : 0800 528 0731

Website : [www.childrenscommissioner.gov.uk](http://www.childrenscommissioner.gov.uk)

## APPENDIX 12

### *OFSTED Review Into Sexual Abuse in Schools and Colleges - Recommendations*

The [Ofsted Review into Sexual Abuse in Schools and Colleges](#) made a number of recommendations for school leaders, for multi-agency partners, for government and for inspectorates. The recommendations for school leaders can be found below and are recognised in this policy, particularly in the section covering child-on-child abuse. The recommendations for other bodies can be referred to using the hyperlink above.

#### **Recommendations for School and College Leaders**

School and college leaders should create a culture where sexual harassment and online sexual abuse are not tolerated, and where they identify issues and intervene early to better protect children and young people.

In order to do this, they should assume that sexual harassment and online sexual abuse are happening in their setting, even when there are no specific reports, and put in place a whole-school approach to address them. This should include:

- a carefully sequenced RSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. This should include time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending of 'nudes'
- high-quality training for teachers delivering RSHE
- routine record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse
- a behavioural approach, including sanctions when appropriate, to reinforce a culture where sexual harassment and online sexual abuse are not tolerated
- working closely with LSPs in the area where the school or college is located so they are aware of the range of support available to children and young people who are victims or who perpetrate harmful sexual behaviour
- support for designated safeguarding leads (DSLs), such as protected time in timetables to engage with LSPs
- training to ensure that all staff (and Advisors, where relevant) are able to:
  - better understand the definitions of sexual harassment and sexual violence, including online sexual abuse
  - identify early signs of child-on-child sexual abuse
  - consistently uphold standards in their responses to sexual harassment and online sexual abuse.