

A member of **Twynham Learning**

Child Protection & Safeguarding Procedures

Last amended 01.09.23 by Sam Fuller, Designated Safeguarding Lead

Reviewed and approved by policy review LAB members Maggie Fidler and Karen Butler.

Ratified by the Local Advisory Board 04 October 2023

Next review date September 2024

These procedures form part of a suite of policies and procedures and should be read in conjunction with the Twynham Learning Child Protection Policy, Keeping Children Safe in Education (KCSIE) 2023 and Working Together to Safeguard Children 2018.

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
CEO and MAT DSL	Gareth Morris	01202 486536
Headteacher	Sam Fuller	01202 485579
Designated Safeguarding Lead (DSL)	Sam Fuller	01202 485579 dsl@cjsdorset.org
Deputy DSLs	Ben Croton (DH) Kate Byles (Welfare Officer) Lisa Sykes (Pupil and Family Support Worker)	01202 485579 dsl@cjsdorset.org
Local Authority Designated Officer (LADO)	Laura Baldwin	01202 817 600 LADO@bcpcouncil.gov.uk
Chair of LAB	lan Mayhew	ian.mayhew@tlgovernance.com
Safeguarding Governor	Maggie Fidler	maggie.fidler@tlgovernance.com
Channel helpline	Channel helpline Dorset Prevent Lead- Mike Hall	020 7340 7264 Michael.hall@dorsetcc.gcsx.gov.uk 01305 458240

1. Aims

The school aims to ensure that:

- Appropriate and proportionate action is taken promptly to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding and understand the requirement to actively engage in promoting a safeguarding culture within school including but not limited to whistleblowing and demonstrating tenacity in challenging agencies and established procedures.
- Leaders and designated leads have robust procedures for the design, implementation and monitoring of safeguarding policies and related practice.
- > Staff are properly trained in recognizing and reporting safeguarding issues. This includes being aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognize their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.
- > The belief that... 'It could happen here' ethos therefore prepared to take action as well as to prevent incidents.
- We work with the Pan Dorset Safeguarding Children Partnership and implement recommendations from Serious Case Reviews to improve the way in which the school works to protect children.
- It raises the awareness of <u>all</u> school staff of the importance of child protection and safeguarding pupils and of their responsibilities for identifying and reporting actual or suspected abuse, neglect or concerns about a child's welfare.
- Pupils and parents are aware that the school takes the safeguarding agenda seriously and will follow the appropriate procedures for identifying and reporting abuse, neglect or concerns about a

- child's welfare and for dealing with allegations against staff confidentially and robustly.
- > We promote effective liaison with other agencies to work together to protect all pupils.
- We integrate a safeguarding curriculum within the existing curriculum allowing for continuity and progress through all key stages.
- > We account of and inform policy in related areas such as discipline, bullying, staff and pupil behaviour policies, Online-Safety and the preventing extremism agenda.

There are three main elements to the school's safeguarding policy and procedures:

- 1. **PREVENTION** (positive and safe school environment, careful and vigilant teaching, accessible pastoral care, support to pupils, good adult role models).
- 2. **PROTECTION** (agreed procedures are followed, staff are trained and supported to respond appropriately and sensitively to safeguarding concerns).
- 3. **SUPPORT** (to pupils who may have been at risk of significant harm, and the way staff respond to their concerns and any work that may be required and to those in need of early help services).

Schools do not operate in isolation. Safeguarding is the responsibility of all adults and especially those working or volunteering with children. The school aims to help protect the children in its care by working consistently and appropriately with all agencies to reduce risk and promote the welfare of children. All practitioners work within the same child protection/safeguarding procedures.

Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to

		ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
НВА	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.

LAB	Local Advisory Board	School governors who work with the headteacher and senior leadership team to drive the strategic development of the school and raise standards of achievement.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked- after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

2. Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance and Keeping children safe in education 2023 (publishing.service.gov.uk) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the <u>Education (Independent School Standards) Regulations 2014</u>, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the <u>Safeguarding Vulnerable Groups Act 2006</u>, which defines what 'regulated activity' is in relation to children
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Sexual Offences Act 2003
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010

Statutory guidance

- DfE (2015) 'The Prevent duty' <u>Statutory guidance on the Prevent duty</u>, which explains schools' duties under the Counter Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation' <u>Statutory</u> <u>guidance on FGM</u>, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2022) 'Recruit teachers from overseas'

- DfE (2022) 'Working together to improve school attendance'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency quidance'

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

3. Definitions

The terms "children" and "child" refer to anyone under the age of 18.

Safeguarding and promoting the welfare of children means:

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

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

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

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

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children. **Children** includes everyone under the age of 18.

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

Sexual violence refers to the following offences as defined under the Sexual Offences Act 2003:

- Rape: A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- Assault by penetration: A person (A) commits an offence if they intentionally penetrate the vagina or
 anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does
 not consent to the penetration, and A does not reasonably believe that B consents.
- Sexual assault: A person (A) commits an offence of sexual assault if they intentionally touch another
 person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably
 believe that B consents.
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged,

sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

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

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

Mental Health

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

Only appropriately trained professionals should try to diagnose 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.

Children requiring mental health support

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.

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.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools' guidance, colleges may also wish to follow this guidance as best practice. (KCSiE 2023)

4. Equality Statement

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

- > Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality (see section 10)
- Have English as an additional language
- Are known to be living in difficult situations for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after

Staff will respect and protect an individual's human rights when they make individual decisions about them. The specific convention rights (Human Rights Act 1998) applying to schools are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education.

Staff are aware that being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these children's rights, depending on the nature of the conduct and the circumstances.

All staff, senior leaders and governors ensure that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of pupils with protection characteristic to ensure due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not.

5. Roles and Responsibilities

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

5.1 All staff

Staff working directly with children need to read at least Part 1. Staff who do not work directly with children, however, need to read either Part 1 or Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy/code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education.
- The responsibility to complete safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating

- to filtering and monitoring), during their induction this will be regularly updated e.g. via email as required, at least annually.
- > The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE), domestic violence, mental health, indicators of being at risk from or involved with serious violent crime, FGM and radicalization.

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

5.2 The Designated Safeguarding Lead (DSL)

Our DSLs is Sam Fuller (Headteacher) with Deputy DSLs of Ben Croton (Deputy Headteacher), Kate Byles (Welfare Officer) and Lisa Sykes (Pupil and Family Support Worker). The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Out of hours the DSL can be contacted on dsl@cjsdorset.org

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

- ▶ Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues including children with a social worker, are experiencing or have experienced, with teachers and school and college leadership (KCSiE Sept 2023)
- > Provide advice and support to other staff on child welfare and child protection matters
- > Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.

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

The full responsibilities of the DSL and deputies are set out in their job description. The Headteacher will have secure processes of oversight ensuring that appropriate measures are being taken to embed safeguarding within the school and that relevant staff are held to account for their statutory duties.

5.3 The Local Advisory Board (LAB)

The LAB approve this policy at each review, ensure it complies with the law and hold the Headteacher to account for its implementation.

The LAB will appoint a senior board level (or equivalent) to monitor this policy's effectiveness with the full Advisory Board. This is always a different person from the DSL.

All Trustees and LAB members are required to have read the most recent version of 'Keeping children safe in education' (KCSIE) in full. Paragraph 81 explains how training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to

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safeguarding.

5.4 The Headteacher

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

- > Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Safeguarding Allegations and Concerns about TL Workers Policy)

6. Confidentiality

The school LAB and the Board of Trustees recognise that their members are in a privileged situation in that they have access to a great deal of information about the school, its pupils and staff. All members within Twynham Learning are reminded that any personal or sensitive information should remain private and should not be divulged verbally to anybody outside the remit of their role within the LAB.

Staff in all categories will have access to large amounts of personal and confidential information. As part of their contract of employment, they are required to be discreet in terms of how such information is used. Information concerning pupils and other members of staff should only be used in the effective execution of their professional duties and under no circumstances divulged to people to whom it is not directly applicable. Care, in particular, will need to be made where the member of staff lives within the direct community served by the school. See the Data Protection Policy for additional information.

You should note that:

- > Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's <u>information sharing advice for safeguarding practitioners</u> includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3

7. Recognising Abuse and Taking Action

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

If you are concerned about a child's welfare or worried they are being abused, you can make a referral to Children's Social Care in Dorset by contacting:

Bournemouth, Christchurch & Poole childrensfirstresponse@bcpcouncil.gov.uk BCP First Response Hub 01202.123.334

In an emergency or out of hours contact:

Bournemouth, Christchurch & Poole Out of Hours Service: 01202 738256

childrensOOHS@bcpcouncil.gov.uk

Dorset Out of Hours Service: 01202 228866

Police Non-Emergency: 101 Police Emergency: 999

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

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- > Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- > Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

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

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

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

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

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

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM

is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

Safeguarding Women and Girls at Risk of FGM (DHSC) - includes Pathway and Risk Assessment tools

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

Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help

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

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

Referral

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

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

The local <u>Dorset Threshold document</u> and the <u>Bournemouth & Poole Levels of Need & Continuum of Support provides guidance about the criteria for making and receiving referrals.</u>

The child must be seen by a qualified social worker as soon as possible following a referral and the child's needs and safety remain paramount at all times.

Escalation policy

At no time must professional disagreement detract from ensuring that the child is safeguarded. The child's welfare and safety must remain paramount throughout.

The <u>Pan-Dorset Escalation Policy</u> identifies a non-exhaustive list of potential areas of disagreement, guidance on preventing disputes and procedures to be followed when disputes cannot be resolved through discussion and negotiation between professionals at front line level.

7.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

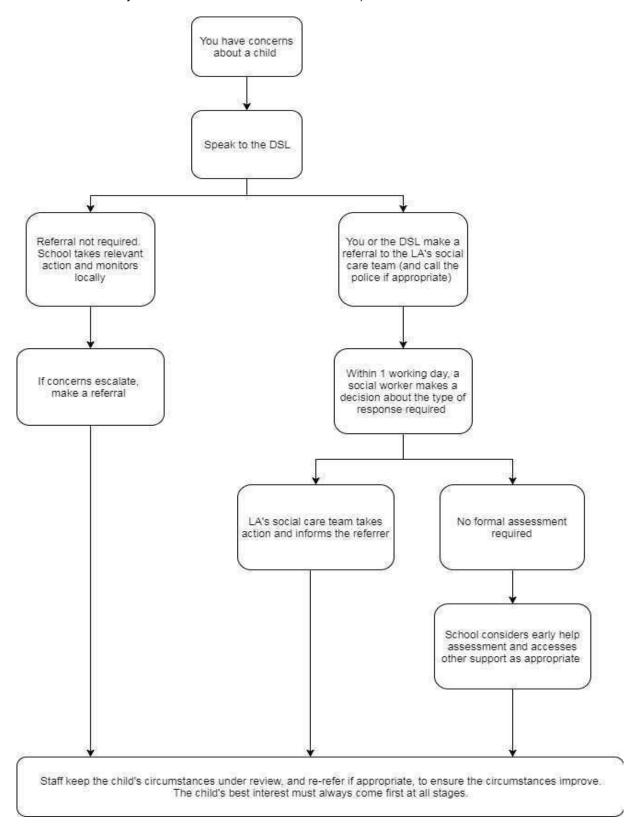
Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include <u>Channel</u>, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) (Note –if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.6 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Headteacher. If the concerns/allegations are about the Headteacher, you must contact the CEO.

The Headteacher/CEO will then follow the procedures set out in the Safeguarding Allegations and Concerns about TL Workers Policy.

Safeguarding concerns about a staff member

There are two types of allegations; allegations that meet the harms threshold and allegation/concerns that do not meet the harms threshold - referred to for the purposes of this policy as 'low-level concerns'.

The term 'low-level' concern does not mean that it is insignificant.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- 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;
- 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.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

- If you have either a 'low-level concern' or wish to make an allegation about a member of staff (in a paid or unpaid capacity, including supply staff, volunteers and contractors), speak to the Headteacher or Executive Headteacher.
- If you have concerns about the Headteacher or Executive Headteacher, you must contact the CEO of TL.
- The Headteacher / Executive Headteacher/CEO will then follow the procedures set out in Safeguarding Allegations and Concerns about TL Workers Policy.

Where the low-level concern shared is about supply staff or contractors, these will be notified to their employers.

Self-Reporting

Occasionally an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an adult may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

7.7 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed

off as "banter", "just having a laugh", "part of growing up" or "boys being boys".

We also recognise the gendered nature of child-on-child abuse (i.e., that it is more likely that girls will be victims and boys perpetrators) and that pupils with special education needs and disabilities are more likely to be abused than their peers. However, all child-on-child abuse is unacceptable and will be taken seriously. This school will approach child-on-child abuse robustly, with a zero-tolerance policy assuming 'this could happen here at this school'. Whilst recognising that child-on-child abuse can take place online and /or not on the school premises. Staff must ensure that students' concerns are being taken seriously.

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

- includes bullying (including cyberbullying)
- includes physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- includes sexual violence (refers to sexual offences under the Sexual Offences Act 2003, these include rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent)
- includes harmful sexual behaviours
- includes up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- involves sexting (also known as youth produced sexual imagery) Is serious, and potentially a criminal offence
- > could put pupils in the school at risk
- > is violent
- involves pupils being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as telling sexual stories, sexual "jokes" indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including sexting)

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

- You must reassure the victim that they are being taken seriously, regardless of how long it may have taken them to come forward and that they will be supported and kept safe. You must explain to them that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- > The DSL will put a risk assessment and support plan into place, considering any intra familiar harms, for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected, including siblings) with a named person they can talk to if needed.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by highlighting this through the pastoral team and assemblies.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child

is being abused themselves, and that this would fall under the scope of this policy

7.8 Sexting

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for <u>all</u> staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- Students will be asked to sign a statement to confirm that they have deleted the image and understood the seriousness of the incident

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

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response?
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

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

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

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

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

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

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through a safer school's officer, a police community support officer, local neighbourhood police, or by dialling 101

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sexting.

Curriculum coverage

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

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation Pupils also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

8. Notifying Parents

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

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

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

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

Children who are looked after, those previously looked after and care leavers

Appropriate staff should hold information about a child's legal status, care arrangements, any contact arrangements, name of the Social Worker and work with the virtual school head/team. Previously looked after children remain vulnerable. Care leavers will have plans initiated by the LA of which the school should be aware. The policy should state the additional support available.

Children who need a social worker (Child in Need and Child Protection Plans)

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

9. Pupils potentially at greater risk of harm

We recognise that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes. Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The LAB will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Children with special education needs (SEND)

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

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

We also offer extra pastoral support for pupils with SEN and disabilities. This includes mentoring and additional tutor /Head of Year /Student Service support as appropriate.

LGBTQ+ pupils

The fact that a pupil may be LGBT is not in itself an inherent risk factor for harm. However, the school is aware that pupils who are LGBT can be targeted by other pupils. In some cases, a pupil who is perceived by other pupils to be LGBT (whether they are or not) can be just as vulnerable as a pupil who identify as LGBT.

We provide a safe space for pupils to speak out or share their concerns with members of staff. LGBT inclusion is part our Relationships Education, Relationship and Sex Education and Health Education curriculum.

10. Online safety and personal electronic devices

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the <u>filtering and monitoring standards</u> published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras. We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

All staff will annually be asked to read and sign the Acceptable Use IT Agreement annually. [please refer to this policy for more detail]

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

11. Use of the school premises for non-school activities

Where the governing board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's <u>guidance</u> on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

12. Complaints and Concerns about School Safeguarding Policies

12.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our Safeguarding Allegations and Concerns about TL Workers Policy.

12.2 Other complaints

Please see the Complaints policy which outlines the process for complaints.

12.3 Whistleblowing

Please see the Whistle blowing policy on the school website.

13. Record-Keeping

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

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

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

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL

will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and preemployment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff
- Appendix 5 sets out our best practice for record keeping

14. Training

14.1 All staff

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

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

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

14.2 The DSL and deputies

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

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

They will also undertake Prevent awareness training.

14.3 Governors

All governors receive regular training about safeguarding, to make sure they have the knowledge and information needed to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.

Governors are aware of their obligations under the <u>Human Rights Act 1998</u>, the <u>Equality Act 2010</u> (including the Public Sector Equality Duty) and their local safeguarding multi-agency safeguarding arrangements.

Governors consider and question how the school is supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

14.4 Recruitment - interview panels

At least one person conducting any interview for a post at the school will have undertaken safer

recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

15. Monitoring Arrangements

This policy will be reviewed **annually** by Sam Fuller, DSL. At every review, it will be approved by the LAB.

16. Links with other Policies

This policy links to the following policies and procedures:

- Behaviour and motivation
- > Staff code of conduct
- Complaints
- > Health and safety
- Attendance
- Online safety
- Equality
- Sex and relationship education
- First aid
- Curriculum
- Privacy notices
- Whistleblowing
- Anti-bullying
- > IT acceptable use
- Child-on-child abuse

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

Appendix 1: Types of Abuse

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.

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example rape or oral sex) or no penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff are aware of how to report it.

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

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

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

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

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

but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation. (KCSiE 2023)

Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures

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

New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below).
- We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ask for written information about previous employment history and check that the information is not contradictory or incomplete. We will only accept information presented on a curriculum vitae alongside an application form.

We will seek references on all short-listed candidates, including internal candidates, before interview. In addition to this, we will carry out an online search to identify any incidents or issues that have happened and are publicly available online. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

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

Existing staff

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

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

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

Agency and third-party staff

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

Contractors

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

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

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

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

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

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

Trainee/student teachers

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

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

Volunteers

We will:

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

Governors

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

They will have an enhanced DBS check with barred list information if working in regulated activity. The Chair of Trustees will have their DBS check countersigned by the Secretary of State.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under <u>section 128 of the Education and Skills Act 2008</u>). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.] Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: Allegations of Abuse Made Against Staff

Please refer to the **Safeguarding Allegations and Concerns about TL Workers Policy** which sets out our approach to managing cases of safeguarding concerns/allegations which might indicate that a TL worker poses a risk of harm to children.

Appendix 4: Specific Safeguarding Issues

This appendix is based on the advice in annex A of Keeping Children Safe in Education

Children missing from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines, domestic violence or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Absent from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

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

These include children who:

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

The school will follow the DfE's <u>guidance</u> on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns. If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child sexual exploitation

Child Sexual Exploitation (CSE) CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).

Children or young people being sexually exploited may not understand their abuse. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- > Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- > Regularly missing school or education, or not taking part in education

Child Criminal Exploitation (CCE)

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

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

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. 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. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups. (KCSiE 2023)

Cyber-crime

For the purposes of this policy, "cyber-crime" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

Domestic Abuse

The <u>Domestic Abuse Act 2021</u> introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right. Domestic abuse is any single incident, course of conduct or pattern of abusive behaviour between individuals aged 16 or over who are "personally connected" to each other because of being, or having been, intimate partners or family members, regardless of gender or sexuality. Children who see, hear, or experience the effects of the abuse and are related to either of the parties are also considered victims of domestic abuse. Behaviour is "abusive" if it consists of any of the following: physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour; economic abuse; or psychological, emotional, or other abuse. This includes incidences where the abusive party directs their behaviour at another person (e.g., a child). Economic abuse means any behaviour that has a substantial adverse effect on someone's ability to acquire, use or maintain money or other property, or obtain goods or services.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or have had to leave the family home.

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

Operation Encompass operates in all police forces across England. It helps the police and schools work together to provide emotional and practical help to children. The system ensures that when the 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 adults, DSL, and Deputy DSL, in school before the child or children arrive at school the following day.

The DSL and Deputy DSL are trained to receive information from Operation Encompass. If school is notified about a domestic incident via Operation Encompass.

The DSL will:

- Speak to the pupil's form tutor before the beginning of the school day to ensure a welfare check can take place. In some cases, this may not be appropriate, and the DSL or Deputy DSL will need to speak to the pupil directly. The DSL will trigger the local safeguarding procedures if appropriate.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- If necessary, seek advice from Operation Encompass 0204 513 9990.
- > Share the National Domestic Abuse Helpline 0808 2000 247 where appropriate.
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

County lines

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in many 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 Mechanism103 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. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office. (KCSiE 2023)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to Children's Social Care in Dorset (childrensfirstresponse@bcpcouncil.gov.uk).

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g they may state that they do
 not feel safe at home, that family members will not let them out the house and/or that family members
 are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

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

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

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

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

Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit, 020 7008 0151 or fmu@fco.gov.uk.

The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils. If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's PSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through training about the issues surrounding forced marriage and the signs to look out for.

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM. Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting, or standing, or looking uncomfortable
 - Finding it hard to sit still for extended periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - · Having frequent urinary, menstrual or stomach problems
 - · Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs for example, withdrawal or depression, or significant change in behaviour
 - · Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

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

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

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

Preventing radicalization

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and ensure staff have access to appropriate training to equip them to identify children at risk.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

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

Checking the identity and suitability of visitors

All visitors must verify their identity to the satisfaction of Reception staff.

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

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

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

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

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

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will contact parents or named contacts immediately, discuss with parents about action to be taken and if the police will be contacted.

Gangs, Youth Violence, Weapons

All staff should be aware of indicators that may signal children are at risk from or are involved in serious violent crime (see list para 29) and links to further guidance Para 30.

These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

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

The school will work closely with the police on these matters.

If this is an issue or anticipated issue what sanctions and support are in place? What agencies are the school working with to help minimise local issues? What positive activities are offered by the school or other agencies to help prevent children engaging in anti-social behaviour?

Children and the court system

The pastoral team should be aware of tools and support which can be accessed and should offer additional support at school/college to children involved in any form of court process.

Children with family members in prison

Explain how the school will work with children 'to help mitigate negative consequences for those children', with a family member(s) in prison and what other agencies may also provide assistance. (NICCO)

Appendix 5: Record Keeping: Best Practice

To be read and followed by all DSLs and Deputies

1. Introduction

- 1.1 The importance of good, clear child welfare and child protection record keeping has been highlighted repeatedly in national and local Serious Case Reviews.
- 1.2 It is the Designated Safeguarding Lead's responsibility to ensure that child protection files, access, storage, and transfer meet the required professional standards as detailed in this document.
- 1.3 The common law of confidentiality, Data Protection and Human Rights principles must be adhered to when obtaining, processing, or sharing personal or sensitive information or records. In summary, the Data Protection Act requires that records should be securely kept, accurate, relevant, and up to date and kept for no longer than is necessary for the purpose for which they were made.
- 1.4 Any electronic record-keeping system should comply with the general standards set out below. (The 'My Concern' system in use in many local schools has been checked for compliance.)

2. Record to be made by an adult receiving a disclosure of abuse (when a child talks about abuse)

- 2.1 This record should be made as soon as possible after the individual hearing the disclosure has reported it verbally to the DSL. The facts, not opinions (unless of particular relevance), should be accurately recorded in a non-judgemental way. It is important to remember that expressing an opinion as to whether the child is telling the truth is not helpful and can prejudice how a case proceeds.
- 2.2 The record should ideally be on a standard 'concerns' form (LA model available from the Safeguarding and Standards Team or on Nexus) but if this is not used, should include:
- > The child's name, gender, and date of birth
- Date and time of the conversation
- What was the context and who was present during the disclosure?
- > What did the child say? verbatim if possible
- What questions were asked? verbatim
- Responses to questions –verbatim
- Any observations concerning child's demeanour and any injuries
- > The name of the person to whom the disclosure was reported
- Printed name and job title of the author, followed by signature and date
- 2.3 The record about a disclosure of abuse should be passed to the DSL and retained in the pupil's child protection file in its original and contemporaneous form (as it could be used as evidence in court proceedings), even if later typed or if the information is incorporated into a report. All schools in Twynham Learning use MyConcern.
- 2.4 Schools should never ask pupils, regardless of their involvement in a child protection matter (i.e., the subject of an allegation, a witness, or the alleged 'perpetrator'), to write out their 'statements' of what has happened. In some cases, this could have the unintended consequence of jeopardising a child protection investigation. This applies regardless of whether the incident(s) took place within or outside school.

3. Records kept by the Designated Safeguarding Lead

- 3.1 As stated at 2.2 above it is useful and recommended practice for school staff to have one standard pro forma for recording all 'welfare' and child protection concerns.
- 3.2 The concern form should be passed to a DSL who will make a judgement about what action needs to be taken, in accordance with local inter-agency safeguarding procedures, using the Threshold Tool, if necessary. The decision about any action, whether a referral is made to Social Care, will

- be recorded clearly by the DSL.
- 3.3 Concerns which initially seem trivial may turn out to be vital pieces of information later, so it is important to give as much detail as possible. A concern raised may not progress further than a conversation by the DSL with the parent, or, at the other end of the scale, could lead to matters being heard in a court.
- 3.4 All 'lower level' / pastoral concerns about a child's welfare, which will generally have been discussed with parents/carers, are kept in the child's main file. Alternatively, some schools have adopted their own systems of collating such welfare concerns, but whichever system is in place, these records should not be labelled 'child protection'.
- 3.5 All conversations/disclosures and records of action should be recorded electronically on MYCONCERN. It is never good practice to keep student welfare records in a diary or day-book system. Often it is only when a number of seemingly minor issues relating to an individual student over a period of time are seen as a whole that a pattern can be identified indicating a child protection concern.

4. Starting a school child protection file

- 4.1 A school child protection file does not necessarily mean that the student is or has been the subject of a child protection conference or plan. 'Child protection file' denotes a high level of school concern which has warranted referral to/ involvement of, and in most cases assessment by, childcare social workers.
- 4.2 It is the responsibility of the DSL to start a school child protection file when a social worker is or was involved, e.g.:
- A formal referral is made by the school to Children's Social Care on an inter-agency referral form or
- Social Care inform the school they have commenced an assessment in relation to a student resulting from information from another source or
- A child protection file is forwarded to the school by a previous school or pre-school attended by the student or
- A child who is in care/looked after transfers into the school or A student is privately fostered
- 4.3 It is not good practice to make 'family files'; each child should have his/her own record which includes information specific to him/her and which will be sent to the next school at the time of transfer. The names of siblings and/or other children who live in the household who also attend the school should be clearly noted on individual files
- 4.4 If two (or more) students at the school are referred to Social Care for the same concern (for example, an allegation of sexually harmful behaviour), then child protection files will be started on both/all students.
- 4.5 School child protection files are never 'closed' or de-categorised. Once a school has started a child protection file, the chronology is maintained so that any future concerns can be considered in the context of past events, even if Social Care ceases involvement.

Note - If there is an allocated social worker because a child is disabled or a young carer and there are no child protection concerns then a child protection file should not be started.

5. Adopted children

- 5.1 When a student is admitted to a school in Reception class and parents provide the information that s/he was adopted prior to commencing education, this should be recorded with their permission on the main school file in order that appropriate support can be provided in future if necessary. In these situations, it is not necessary to start a child protection file **unless** the criteria described above (at 4.2a and 4.2b) also apply.
- 5.2 Some older adopted children will have school child protection files because they were initially in care/looked after and were subsequently adopted. During the period when the child is 'placed for adoption' (prior to an adoption order being made) any file that contains information that identifies both the birth family, and the adoptive family must be classed as highly sensitive, and this information should only be shared on a strictly 'need to know' basis.
- 5.3 Once the adoption order has been made the DSL in the school that holds the child protection file must overhaul the file. The principle is that there must be nothing that identifies the child's birth name or the birth family. In sifting the file, it is acceptable to destroy documents that will continue

- to be held by other agencies: for example, child protection conference minutes and LAC review minutes which will be in Social Care records.
- 5.4 A chronology should be prepared that gives an overview of the information previously held in the file but without giving the child's birth name or any details which would identify the birth family.
- 5.5 The overhauled file should only contain the new chronology and any information that has originated from within the school (for example concern forms). This file should now be in the child's new name, containing no information which identifies the birth name or birth family, will be held in the school as long as the child remains or sent onto a new school as described (at 9) below.
- 5.6 Please note that once a child is adopted, all school records, not just child protection files, must be amended so that there is nothing which gives the birth name or identifies the birth family.

6. Storage

- 6.1 All records relating to child protection concerns are sensitive and confidential so will be kept in a secure (i.e., locked at all times) filing cabinet, separate from other school files, and accessible through the DSL, the Deputy(ies) and other senior staff in larger schools.
- 6.2 The student's general school file should be marked in some way (e.g., a yellow star) to indicate that a child protection file exists. All staff who may need to consult a child's school file should be made aware of what the symbol means and speak to the DSL if necessary if they see this symbol and have concerns. For example, a member of the office staff who is looking in the main file for a parent's contact details because of unexplained absence might decide to report this to the DSL if they see the indicator, in case the absence is significant

7. Sharing of and access to child protection records

- 7.1 It is highly unlikely that all members of staff need to know the details of a child's situation, or that there should be widespread access to the records. Access to, and sharing of, information should be on a need-to-know basis, decided case by case. The DSLs are the best people to decide this. Consideration must also be given to what needs to be shared. Generally, the closer the daily contact with the child, the more likely the need for information.
- 7.2 The child who is the subject of a child protection record has the right to access the file, *unless* to do so would affect his/her health or well-being or that of another person or would be likely to prejudice a criminal investigation or a Section 47 assessment (which relates to significant harm) under the Children Act 1989.
- 7.3 Parents (i.e., those with parental responsibility in law) are entitled to see their child's child protection file, with the same exemptions as apply to the child's right to access the record. Note that an older student may be entitled to refuse access to the record by his/her parents. As a guide, this applies to students who are 12 years of age or above if they are of normal development or maturity.
- 7.4 References by name to children other than the student who is the subject of the file should be removed when disclosing records, unless consent is obtained from the individual/s concerned (or their parents/carer on their behalf). Care must be taken to ensure all identifying information is removed from the copy of the record to be shared.
- 7.5 Always seek advice from your legal advisor or Dorset Data Protection Officer (01305 225175) if there are any concerns or doubts about a child or parents reading records. However, it is good practice to share all information held unless there is a valid reason to withhold it, e.g., to do so would place the child or any other person at risk of harm. Any requests to see the child's record should be made in writing to give time for confidential information, such as any details of other students, to be removed.
- 7.6 In respect of requests from students or parents for information which wholly or partly consists of an educational record, access should be granted within 15 school days. This might be relevant to 'welfare' concerns in a main school file, for example. Viewing-only access to these records is free but it is reasonable to charge for copies on a sliding scale from £1 £50 (maximum) depending on the number of pages.
- 7.7 However, should the request only seek access to a child protection file (which is not classed as an educational record), access should be granted within 40 calendar days. A discretionary maximum fee of £10 can be charged for viewing access to or a copy of a child protection record.
- 7.8 If the record to be disclosed contains information about an adult professional, that information can be disclosed if it relates to the performance by that person of their job or other official duties e.g., a reference to a teacher in their teaching role or a school nurse in their nursing role. However, if the reference refers to that individual's private life, it should be removed (unless this relates to a child protection matter which is relevant to the record to be disclosed).

- 7.9 Child protection information should not normally be shared with professionals other than those from Social Care, the Police, Health, or the Local Authority. Ofsted and other school inspectors can view individual child protection files. Information should not be released to parents' solicitors on request; advice should be sought from the school's legal advisor in such cases.
- 7.10 Governors, including the Nominated Governor, should not access the records.

8. Transfer of child protection records

- 8.1 When a student transfers to another school (including to a Learning Centre because of permanent exclusion) the DSL should inform the receiving school as soon as possible in person or by telephone that child protection records exist. The original records must be passed on either by hand or sent by recorded delivery, separate from the child's main school file. Care must be taken to ensure confidentiality is maintained and the transfer process is as safe as possible.
- 8.2 If the records are to be posted, they should be copied, and these copies retained until there has been confirmation in writing that the originals have arrived at the new school. They can then be shredded.
- 8.3 Whether child protection files are passed on by hand or posted, there should be written evidence of the transfer (such as a form or slip of paper signed and dated by a member of staff at the receiving school.) This receipt should be retained by the originating school for 6 years (in line with guidance from the Records Management Society).
- 8.4 If the student is removed from the roll to be home educated, the school should pass the child protection file to the LA EHE Administrator and a receipt obtained as described above.
- 8.5 If a student with a child protection record leaves the school without a forwarding address and no contact is received from a new school the DSL should follow the school's Child Missing Education (CME) procedures. If there is reason to suspect the student is suffering harm, then the DSL will refer to Social Care in the usual way.
- 8.6 If a child arrives in the school in an unplanned way and / or there are concerns about them from the outset, it is worth contacting the previous school for a discussion with the DSL. There might be a child protection file which has not been passed on.
- 8.7 School 'welfare' or pastoral records (i.e., where concerns or issues have been raised but there has been **no** referral to or involvement by a social worker) should also be passed on to the next school for their information and can be included in the main school file, for example. In respect of data protection, parents/carers should be made aware (either individually or through newsletters, for example) that information is transferred in this way to enable the next school to properly support their child. Most parents will understand the reason for this but if for whatever reason a parent disagrees with you passing on non-child protection documents, you should not do so.

9. 'Dual registered' students

9.1 Where a student is on roll at the school and starts to attend a Learning Centre (LC), the chronology and other relevant information in the child protection file should be copied and passed to the DSL at the LC at the earliest opportunity. Because of the nature of such 'bespoke' arrangements for individual student, the two DSLs should agree on which one of them will keep the chronology updated and how best to communicate to each other significant events and issues in relation to that student.

10. Retention of records

- 10.1 The school should retain the record for as long as the student remains in school and then transferred as described above.
- 10.2 Guidance from the Records Management Society is that when a student with a child protection record reaches statutory school leaving age (or where the student completed 6th form studies), the last school attended should keep the child protection file until the student's 25th birthday. It should then be shredded (and a record kept of this having been done, date, and why).
- 10.3 The Independent Inquiry into Child Sexual Abuse has instructed relevant organisations, including schools and colleges, that they should NOT destroy, for the foreseeable future, any of their records that could potentially come within the scope of the inquiry (i.e., any records relating to sexual abuse).

11. Electronic child protection records

11.1 Electronic records must be password protected with access strictly controlled in the same way as

- paper records.
- 11.2 They should be in the same format as paper records (i.e., with well-maintained chronologies etc.) so that they are up to date if/when printed, if necessary.
- 11.3 Electronic files should be transferred electronically via MyConcern. When the receipt has been returned to confirm that the file has been received at the new school, the computer record should be deleted.

12. Sharing information with Further Education (FE) Colleges

12.1 A protocol is in place with DSLs at FE colleges: at the start of each academic year, they will send to secondary school DSLs a list of newly enrolled students who have previously attended the school, requesting any relevant information. Secondary school DSLs will use their professional judgement but should always disclose if a young person is in care/looked after, is or has been subject of a child protection plan or is assessed as posing a risk to themselves or other students.

Note this applies only to Dorset schools and FE Colleges with whom the protocol has been agreed.