



# Hillside Junior School

## CHILD PROTECTION POLICY

**POLICY DETAILS:**

**Legal Status:** Statutory

**Adopted:** September 2023

**Version Date:** September 2023

**Last Review:** September 2022

**Next Review:** September 2023

**Aim:** To keep children safe.

To create a culture of vigilance.

To ensure that staff know how to react and what to do if they suspect a child is being abused, neglected or is vulnerable.

To always work in the best interest of the children.

Designated member of staff responsible for coordination of action within the school and liaising with other agencies are: **Mr Andrew Davies** Headteacher and Designated Safeguarding Lead, **Ms Olivia O'Connor** Deputy Headteacher and **Mrs Rachel Mason** Raising Standards Lead. The Governor responsible for child protection is: Mrs **Joy Mason**

These are the procedures we follow:

[Working together to Safeguard Children 2018](#)

All relevant contact numbers and useful links are on the inside cover of the Child Protection folder.

Staff training was updated on September 2022 where the following documents were discussed:

- [DFE - Keeping Children Safe in Education \(Information for School and College Staff\) 2022](#)

All staff and governors working with children should read this booklet:

[What to do if you are worried a child is being abused.](#)

### **Victims and alleged perpetrator(s)**

For the purposes of this guidance, we, in places, use the term 'victim'. It is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable. For the purpose of this advice, we, in places, use the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. However, schools and colleges should think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. As above, the use of appropriate terminology will be for schools and colleges to determine, as appropriate, on a case-by-case basis.

### **DEFINITIONS OF ABUSE and EXPLOITATION:**

#### **Emotional Abuse**

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

## **Neglect**

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, shelter and clothing, including exclusion from home or abandonment. Neglect may be failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-givers, or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Physical Abuse**

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 causes, ill health to a child whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy or Munchausen's syndrome by proxy. 'Honour based' abuse is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

## **Sexual Abuse**

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

## **CSE and CCE**

Child sexual exploitation and child criminal exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities or criminal activities. Exploitation can take many forms ranging from the seemingly 'consensual' relationship, where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The imbalance can be due to age, as well as other factors like 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 (e.g. increased status) of the perpetrator or facilitator. It can be perpetrated by individuals or groups, males or females, and children or adults. It can be a one-off occurrence or be a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and can involve violence or threats of violence. It can happen online as well as in person.

The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

CSE can include vehicle crime and threatening/committing serious violence. Children may become trapped as they or their families may be threatened with violence and they may be coerced or entrapped into debt or into carrying weapons. They may carry weapons as a form of protection. Children involved in criminal exploitation need to be

treated as victims themselves (particularly older children), even though they may commit crimes themselves. You should be aware that girls are at risk of criminal exploitation too, even though their experience may be different.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17- year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

### **FGM - Female Genital Mutilation**

The school community needs to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child, or young person, may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff must activate local safeguarding procedures using existing national and local protocols for multi-agency liaison with police and children's social care. There is a mandatory duty on teachers to report FGM.

### **CME**

Children missing in education should be reported to the Participation Team straight away.

### **Forced Marriage**

It is important for staff to remain vigilant with changes of behaviour with children and report concerns to the DSL. Unexplained absences of pupils, especially taking children abroad, should be discussed with the DSL.

### **Involvement in serious or violent crime**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

### **Prevent Duty**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach. See appendix 7. Staff will follow the same reporting procedures if they have concerns.

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their

own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Harm can include ill treatment that isn't physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children.

## **IDENTIFYING ABUSE**

A child may disclose abuse in a number of ways, for example; verbal disclosure, written word, pictorial representation, or through changes in his/her behaviour. The disclosure may take place on one specific occasion, or over a period of time. A child will generally make his/her disclosure to a trusted person. This could be a member of their family or a friend; but is often to a member of staff in school. Additional barriers can exist when recognising abuse and neglect in relation to children with SEN and disabilities. Everyone needs to be vigilant. Children whose attendance is a concern will be discussed with the Participation Team. Any child whose whereabouts cannot be accounted for will be reported to the Participation Team in line with Children Missing from Education CME.)

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 exploitation, criminal exploitation, sexual abuse serious youth violence and county lines. All staff should be aware of indicators of abuse and neglect. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with their designated safeguarding lead (or deputy).

## **SIGNS AND SYMPTOMS**

*The following behavioural signs may or may not be indications that abuse has taken place; but the possibility should be considered:*

### **Physical signs of abuse:**

- Any injuries not consistent with the explanation given for them.
- Injuries which occur to the body, in places which are not normally exposed to via falls, rough games etc.
- Injuries which have not received medical attention.
- Neglect - under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care etc.
- Reluctance to change for, or participate in, games or swimming.
- Repeated urinary infections, or unexplained tummy pains.
- Bruises, burns, bites and fractures etc, which do not have an accidental explanation.
- Cuts/scratches/substance abuse.

### **Emotional signs of abuse:**

- Changes of regression in mood or behaviour, particularly where a child withdraws or becomes 'clingy'. Also, depression/aggression, extreme anxiety.
- Nervousness, frozen watchfulness.
- Obsessions or phobias.
- Sudden under achievement or lack of concentration.
- Inappropriate relationships with peers and / or adults.
- Attention-seeking behaviour.
- Persistent tiredness.
- Running away / stealing / lying.

## **Signs of possible Sexual Abuse:**

- Any allegations made by a child concerning Sexual Abuse.
  - Child with excessive preoccupation with sexual matters, and detailed knowledge of adult sexual behaviour; or who regularly engages in age-appropriate sexual play.
  - Sexual activity through words, play or drawing.
  - A child who is sexually provocative, or seductive, with adults.
  - Inappropriate bed-sharing arrangements at home.
  - Severe sleep disturbances with fears, phobias, vivid dreams or nightmares; sometimes with overt or veiled sexual connotations.
  - Eating disorders - anorexia, bulimia.
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- All staff should 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 trained professionals should make a diagnosis of a mental health problem, but staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem, or be at risk of developing one
  - Abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact, and it's key that staff are aware of how these experiences can affect children's mental health, behaviour and education
  - Staff should take action on any mental health concerns that are also safeguarding concerns, following your school's child protection policy and speaking to the DSL or deputy

## **Child on Child Abuse**

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting) or upskirting.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers (sometimes known as 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

Children who are lesbian, gay, bi, or trans (LGBT). The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

## **Vulnerable Children**

Vulnerable children are children who may not be abused but may have difficulty in keeping themselves safe. This may be on a temporary basis. Staff should be vigilant for children who may be homeless or about to be made homeless. Unexplained absences will always be tackled by Welfare staff as this may be a symptom of being used for [County Lines](#). Children with SEND may be especially vulnerable and staff should be vigilant for any changes of behaviour that may reflect that they have been abused. Additional barriers exist in recognising abuse and neglect. These include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges.

Children whose parents are in prison will need extra pastoral care to ensure that they thrive. Children who are young carers should be supported. Vulnerable children in school may have had an incident of bullying reported towards them. These children should be supported and listened to and a CPOMS report filled in. Their class teacher should be informed and all staff should be aware, so that they can be monitored on the playground. A buddy should be provided at play times and the behaviour monitored. The 'bully' should be dealt with under the behaviour policy and Anti Bullying Policy, but staff should be aware that children who bully may well be bullied themselves.

## **PROCEDURES**

During the event of a school lockdown, it is the responsibility of the class teacher to make telephone contact with the family every 2 weeks. If this is not possible, then staff must let the DSL know and they will attempt to make contact via alternative avenues such as home visits. When staff see or are worried about any signs, which cause them concern they should immediately talk to the Headteacher or the designated safeguarding lead. Any concern should be logged on CPOMS. After discussion with the Headteacher or the designated member of staff, further information should be sought from the child, if necessary. This must be done with tact and sympathy. See **Appendix 2** for Referral Procedures

### **Talking to the child**

It may be felt that the class teacher or member of the support staff would be the appropriate person to talk to the child rather than the designated member of staff.

Staff should be aware that the way in which they talk to a child can have an effect on the evidence which is put forward if there are subsequent criminal proceedings.

"Tell me what has happened." Listen; do not interrupt if the child is freely recalling events.

See **Appendix 1** 'Responding to children.'

### **Note taking**

Staff should record the time, date, place and people who were present, as well as what was said. Comments about how an injury or incident occurred should be recorded, quoting the words actually used if possible. There is no

requirement for these notes to be made available to parents in this case. Notes will be stored in a separate folder next to the pupil's record in the headteacher's office.

## **Confidentiality**

When talking to a child, or interviewing anybody else offering information, it should be made clear that it **may not** be possible to maintain confidentiality if this would prejudice the child's welfare. Protecting the child must always take priority. The child should be assured that the matter will be disclosed only to the people that need to know about it. The child should be assured that they are being taken seriously and that they will be supported and kept safe. They shouldn't be given the impression they are creating a problem or made to feel ashamed for making a report.

All staff should be 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 recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

## **Child on Child Abuse**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter" or "part of growing up".

Members of staff:

- Don't need to wait for a child to make a disclosure, they should act on any concerns immediately
- May overhear a conversation that suggest a child may have been harmed or a child's behaviour may be an indicator
- May confiscate devices for evidence to hand to the police, if the report includes an online element
- Can ask children outright if they've been harmed and what the nature of the harm was
- Should keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- Should reflect back, using the child's language, when hearing a report
- Should recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse

It should be clear to all victims that the law on child-on-child abuse is there to protect them, not criminalise them. The school will consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

## **We will minimise the risk of child on child abuse by:**

- Challenging any form of derogatory or sexualised language or behaviour, we will not accept it as 'banter'.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing pupils, and initiation or hazing type violence.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially.
- 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.
- Children who walk to school by themselves may bring their phones but they must hand in their phones to the office and are not allowed to use them during the school day.



All staff should:

- Be aware that technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse (as well as face to face)
- Be aware that children can abuse their peers online through:
  - Abusive, harassing, and misogynistic messages
  - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
  - Sharing of abusive images and pornography, to those who don't want to receive such content
  - Recognise the indicators of peer-on-peer abuse, know how to identify it and respond to reports
  - Recognise that peer-on-peer abuse may be taking place, even if not reported
  - Understand their role in preventing it and responding to it if they believe a child may be at risk
  - Understand the importance of challenging inappropriate behaviours between peers. If they don't, it can create an unsafe environment and lead to a culture that normalises abuse
- Abuse can take place inside and outside of school or online.
- Maintain an attitude of "it could happen here"
- Recognise addressing inappropriate behaviour can help prevent abusive/violent behaviour
- Victims of this abuse will likely find the experience distressing, which can affect their progress in school, this can be made worse if the alleged perpetrator(s) attends the same school
- Be aware that girls are more likely to be victims and boys are more likely to be the perpetrators
- It could be done by a group, not just an individual
- **If a pupil makes an allegation of abuse against another pupil:**
  - The DSL must be informed
  - The DSL will contact the LA children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
  - The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
  - The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children

### **Sharing of nudes and semi-nudes ('sexting')**

Your responsibilities when responding to an incident

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

You must **not**:

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

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

## Online safety and the use of mobile technology

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

To address this, our school aims to:

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

### The 4 key categories of risk

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

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

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

- Educate pupils about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment...These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

### **Allegations against Staff Members**

All staff are required to report any concern or allegations about school practices or the behaviour of colleagues, which are likely to put pupils at risk of abuse or other serious harm. Such reports are made to the Headteacher Safeguarding Lead and the Local Authority Designated Officer (LADO). Where an allegation or complaint is made against the Designated Safeguarding Lead, the matter will be reported immediately to the Chair of Governors. There will be no retribution or disciplinary action taken against a member of staff for making such a report, provided that it is done in good faith. There is a separate policy on 'Whistle Blowing'. The procedures set out in the statutory guidance Keeping Children Safe in Education 2022 Part Four. Staff should refer concerns or allegations about supply staff to the Headteacher. See Appendix 6

### **Safer Recruitment**

The school has a Safer Recruitment policy to ensure that all people working in school meet rigorous standards and pass the correct checks. DBS checks are also carried out on all volunteers who come into school regularly and or accompany pupils on trips off site. See Appendix 5

### **Role of Designated Safeguarding Lead**

1. Recognise signs of abuse.
2. Know the child protection procedures.
3. Be able to refer to appropriate agencies.
4. Keep up to date with Child Protection training.
5. Provide training for members of staff.
6. Prepare reports for Case Conferences and Core Group Meetings and support colleagues who may be attending these.
7. Ensure the monitoring of any child placed on the child protection register.
8. Monitor the curriculum which will build awareness of the danger of abuse, helping children to protect themselves and develop responsible attitudes (link to PSHE, R.E. and "hidden" curriculum).
9. Ensure vulnerable children are monitored.
10. Ensure that the LA is informed of any child in a private fostering.
11. When a child has a social worker, hold and use this information in the best interests of the child's safety, welfare and educational outcomes, such as when decisions are made on: responding to unauthorised absence or missing education where there are known safeguarding risks and the provision of pastoral and/or academic support.
12. Understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners; understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

13. Liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.
14. Work alongside external agencies as part of the safeguarding process.

### **Role of the Headteacher**

The Headteacher needs to take responsibility for ensuring the following:

1. The school's policies and procedures, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.
2. That there are Child Protection, Anti-Bullying and Restraint Policies active within the school.
3. Be able to respond when a Child Protection concern arises about a child in the school.
4. Consult with LA Lead Officer about any allegation regarding a staff member.
5. Speak to parents when necessary.
6. Make appropriate referrals.
7. Ensure information about children on the Child Protection Register is passed on to receiving schools if a child moves.
8. Receive current, up to date training annually.
9. Ensure vulnerable children are being monitored.
10. Ensure all staff are updated on safeguarding, at least annually.

Ensure all staff have read and understood Part 1 of [“Keeping Children Safe in Education Sept 2022”](#)

### **Role of the Governors**

1. Governing Boards should facilitate a whole school or college approach to safeguarding. Safeguarding and child protection to be "at the forefront" and underpin all relevant aspects of process and policy development.
2. Ensure a Designated Lead and a Deputy Designated Lead, are appointed in their schools.
3. Have a full understanding of the roles of the Designated Lead and Deputy Designated Teachers for Child Protection.
4. Check child protection training has been given to all staff annually.
5. Review the Child Protection Policy annually.
6. Ensure school staff and volunteers are vetted by checking the Central Register.
7. Designated Governor or the Chair of Governors to sign that they have seen the Central Register.
8. Receive a full annual report on all Child Protection matters.
9. Ensure a copy of the child protection policy approved by Full Governors is available for parents.
10. Ensure that the staff follow safer recruitment procedures.
11. Ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
12. Ensure the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns), about staff members (including supply staff, volunteers and contractors. This behaviour which is inconsistent with the staff code of conduct or does not meet the harm threshold could include: being over friendly with children, having favourites, taking photos 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 and humiliating pupils.
13. Governing bodies and proprietors should ensure that children are taught about safeguarding, including online safety (should be a running and interrelated theme). Schools should consider this as part of providing a broad and balanced curriculum. This may include covering relevant issues for schools through Relationships which will be compulsory from September 2020.
14. Governing boards should ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and children with SEND.
15. Receive appropriate safeguarding and child protection (including online) training at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge. This is so they can be assured that

safeguarding policies and procedures are effective and support your school to deliver a robust whole school approach to safeguarding.

16. Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and the Public Sector Equality Duty (PSED).
17. Seek assurance that where another body is providing services or activities, that they have appropriate safeguarding and child protection policies/procedures in place. This applies regardless of whether or not the children who attend these services/activities are children on the school roll/attend the college.
18. Your designated safeguarding lead (DSL) has the appropriate status and authority to carry out their job. Governing bodies need to give the DSL the additional time, funding, training, resources and support needed to carry out their role effectively.

#### **Related Policies**

- Anti Bullying Policy
- Attendance Policy
- Prevent Policy
- Good Behaviour Policy
- Safer Recruitment Policy
- Whistleblowing Policy

#### **Important Links**

Designated Safeguarding Lead Andrew Davies 01923825991 [adavies@hillsidejunior.org](mailto:adavies@hillsidejunior.org)

Deputy Safeguarding Lead Olivia O'Connor 01923825991 [ooconnor@hillsidejunior.org](mailto:ooconnor@hillsidejunior.org)

Deputy Safeguarding Lead Rachel Mason 01923825991 [rmason@hillsidejunior.org](mailto:rmason@hillsidejunior.org)

Safeguarding Governor Joy Mason [chairgb@hillsidejunior.org](mailto:chairgb@hillsidejunior.org)

Chair of Governors Joy Mason [chairgb@hillsidejunior.org](mailto:chairgb@hillsidejunior.org)

Child Protection Lead LBH: Nicole Diamond 07943097366 [ndiamond@hillingdon.gov.uk](mailto:ndiamond@hillingdon.gov.uk)

LADO (Complaints against staff) Hannah Ives 01895 277463 Mobile: 07753431285 [hives@hillingdon.gov.uk](mailto:hives@hillingdon.gov.uk)

Hillingdon Duty Social Worker: 01895 556633 Out of Hours: 01895 277226 or 250111

Email: [lbhmash@hillingdon.gov.uk](mailto:lbhmash@hillingdon.gov.uk) or [mashsecure@hillingdon.gcsx.gov.uk](mailto:mashsecure@hillingdon.gcsx.gov.uk)

Duty Social Worker: 01438 737500 (Hertfordshire)

Participation Officer To be advised 01895 250858 [ritap@hillingdon.gov.uk](mailto:ritap@hillingdon.gov.uk)

School Nurse: Gail Warren 07889233129

## **Appendix 1**

Responding to Children:

1. Listen to the child. Allow them to talk freely.

Ask 'Can you tell me who it was?' If they won't answer don't push them or offer suggestions.

Stop. Don't ask any more questions. We are here to gather information in order to make a referral and not to investigate

2. Tell the child they are not to blame.
3. Take seriously what the child has said. We should not make judgements about the information given.
4. Affirm 'I'm glad you told me. It was right to tell me. You have been brave and strong to tell me'.
5. Refer - tell the child you must tell other people who can help. Tell the person responsible for the child protection within your school.
6. Follow the boroughs guidelines and procedures (In Child Protection folder in the staffroom)
7. Put in writing what the child has told you as soon as possible. Certainly within 24 hours.

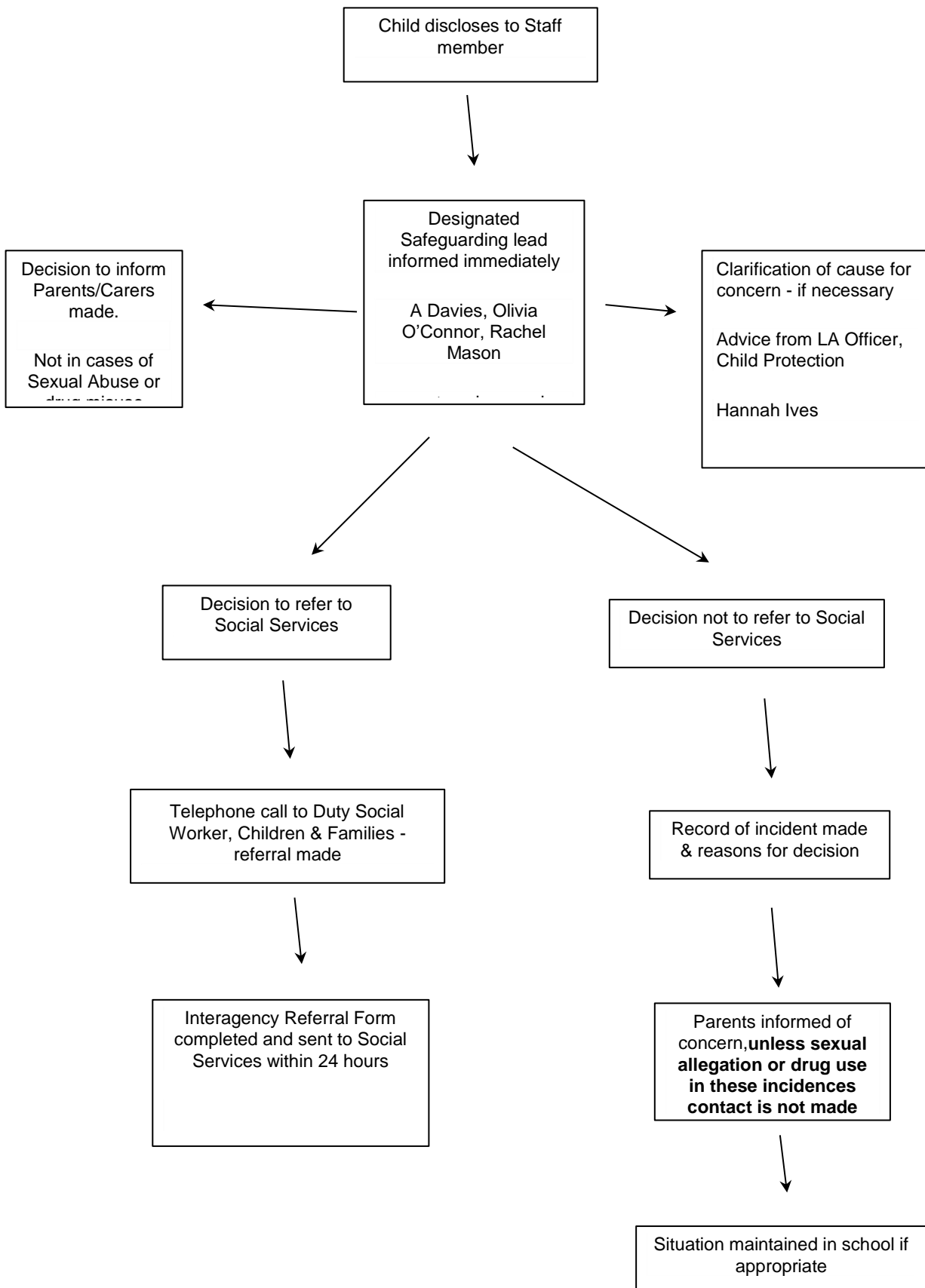
**NEVER TELL A CHILD YOU WILL KEEP A SECRET THEY HAVE TOLD YOU.**

## Appendix 2

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

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan); • has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

**Appendix 3**  
**Referral Procedures for when a child is making a disclosure of abuse**



NB: At each stage advice can be sought from the Lead Officer for Child Protection in Education, Youth & Leisure (Hannah Ives) 01895 277463



## Appendix 4

### REFERRAL CHECKLIST

Referrer's Name, Designation and Contact Point

Full Name of Child for whom there is concern

Date of Birth

School Attended

Race Culture Language and Religion of Child

Address of Child

Carers of Child - full name, date of birth, address, telephone number, their race culture language and religion and whether they have any special needs.

People with Parental Responsibility: if different

Health Visitor

General Practitioner

School Nurse

Details of how the concern was aroused, for how long there has been concern and reason for present contact being made to register concern.

Description of Cause for concern, details of any injuries noticed, how noticed, when noticed and the site(s) size(s) and description of the injuries.

Anything the Child or anyone else has said about the injury or cause for concern, e.g. how it happened, where it happened, when it happened, who else was there at the time.

Details and Dates of Incidents causing concern in the past and how they have been dealt with.

Information about the general appearance of the child now and if this is consistent with how the child generally appears.

Any Observations about the family generally; siblings and school attended, dates of birth, ages, degree and regularity of contact with referred, general care and attitude of parents to children.

Where the Child is now

Whether anyone has been alleged to be the abuser

Whether the Parents have been informed about the referral.

## Appendix 5: safer recruitment and DBS checks – policy and procedures

### Recruitment and selection process

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

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

### Advertising

When advertising roles, we will make clear:

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

### Application forms

Our application forms will:

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

### Shortlisting

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

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

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

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage.

The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

## **Seeking references and checking employment history**

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

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed
- In addition, as part of the shortlisting process we will consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.
- Not include any repeated concerns or allegations that have all been found to be false, unfounded, unsubstantiated or malicious in a reference.

## **Interview and selection**

When interviewing candidates, we will:

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

## **Pre-appointment vetting checks**

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

## **New staff**

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK.

Where available, these will include:

- For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**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**

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

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

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

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

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **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.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

## **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
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

## **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.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

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

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

## **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.

## Appendix 6: allegations of abuse made against staff

### Section 1: allegations that may meet the harms threshold

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

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

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

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

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

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

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

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

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

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



## Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
  
- Children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

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

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

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

#### **Timescales**

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

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

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

## **Specific actions**

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

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

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

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

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

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

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

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

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

If a report is:

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

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

If an allegation is:

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

## **Confidentiality and information sharing**

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

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

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

## **Record-keeping**

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

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

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

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

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

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

## **References**

When providing employer references, we will:

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

## Learning lessons

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

This will include consideration of (as applicable):

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

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

## Non-recent allegations

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

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

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

## Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

## Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

### **Sharing low-level concerns**

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

We will create this culture by:

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

### **Responding to low-level concerns**

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct.

### **Record keeping**

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

Records will be:

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

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

## References

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

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

## Appendix 7

### County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: • go missing and are subsequently found in areas away from their home; • have been the victim or perpetrator of serious violence (e.g. knife crime); 127 • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; • are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection; • are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity; • owe a ‘debt bond’ to their exploiters; • have their bank accounts used to facilitate drug dealing.

### Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. 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 and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. 129 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. The Act’s provisions, including the new definition, will be commenced over the coming months.



## **Operation Encompass**

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

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#). So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage) So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider 131 network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. Actions If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers<sup>128</sup> that requires a different approach (see following section).

## **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

### **Prevent**

The Prevent duty All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations.

### **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.