

## Child Protection and Safeguarding Policy and Procedure

### Policy Review and Approval

Review interval: 1 Year  
 Review term: Autumn Term 1  
 Reviewed by: Designated Safeguarding Lead and Head Teacher  
 Approved by: Full Governing Board

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*A copy of this policy and other related policies can be obtained from the School Office.*

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We have the highest aspirations for our school and every member of our school community. By inspiring courage, pride and respect we will all end up as confident, ambitious and successful life-long learners.

*This policy has been subject to a workload impact assessment as part of our commitment to reducing workload. As a direct result, the use of computerised systems has reduced the workload associated with the previous paper based system. Whilst the increased details within this policy and the updates version of Keeping Children Safe in Education may lead to staff needing to make more referrals, this is of significant benefit to the students in terms of safeguarding.*

## 1. Key information and contacts

Role	Name	Contact Details
Designated Safeguarding Lead	Jemma Graffham	<a href="mailto:dsl@gildredgehouse.org.uk">dsl@gildredgehouse.org.uk</a>
Deputy Designated Safeguarding Lead	Carley Hawkins	
Designated Safeguarding Officer		
Lead Governor for Safeguarding	Matt West	<a href="mailto:m.west@gildredgehouse.org.uk">m.west@gildredgehouse.org.uk</a>
Chair of Governors	Julian Mace	<a href="mailto:j.mace@gildredgehouse.org.uk">j.mace@gildredgehouse.org.uk</a>
Local Authority Designated Officer (LADO)	Amanda Glover	01323 464222 <a href="https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/#">https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/#</a>
Referrals into Early Help and Social Care	Single Point of Advice (SPoA)	01323 464222 <a href="mailto:0-19.SPoA@eastsussex.gov.uk">0-19.SPoA@eastsussex.gov.uk</a>
	Emergency Duty Service - after hours, weekends and public holidays	01273 335906 01273 335905

### Links with other policies

This policy links to the following policies and procedures:

- Behaviour for Learning and Exclusion Policies
- Anti-Bullying and the Prevention of Bullying Policy
- Complaints Policy and Procedure
- Student Attendance Policy
- Equality Policy
- Personal Social Health Economic Education
- Sex and Relationships Education
- Whistleblowing Policy
- Safer Recruitment Policy
- Data Protection Policy
- Health and Safety Policy
- Staff Behaviour and Code of Conduct Policy
- Capability Policy and Procedure
- EYFS and Primary Uncollected Child Policy and Procedures
- Maintaining Children’s Safety and Security in the EYFS and Primary

## 2. Aims

This Child Protection and Safeguarding Policy and Procedure reflects our active commitment to promote and safeguard the welfare of all students at our school, including those in the EYFS, and is in line with the 'Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2020' document. We believe that children have a fundamental right to feel safe and protected from any form of abuse and exposure to marginal religious viewpoints and acts of terrorism or extreme cruelty in the name of any religious group.

Therefore, we will provide a secure and caring environment, with highly skilled and aware staff, and a curriculum which nurtures self-esteem and empowers children to protect themselves.

Gildredge House aims to ensure that:

- appropriate action is taken in a timely manner to safeguard and promote children's welfare;
- all staff are aware of their statutory responsibilities with respect to safeguarding; and
- staff are properly training in recognizing and reporting safeguarding issues.

## 3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2020\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

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

- The Local Authority (LA).
- A clinical commissioning group for an area within the LA.
- The Chief Officer of Police for a Police area in the LA area.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and Local Authorities to safeguard and promote the welfare of students.
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the Police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.

- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children.

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

#### 4. Definitions

Safeguarding and promoting the welfare of children means:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

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

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

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

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

**Children** includes everyone under the age of 18.

**Emotional abuse** is any type of abuse that involves the continual emotional mistreatment of a child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child.

**Staff** should be broadly read, within this policy, as any adult working within the school, whether directly employed, providing a contracted service, or a one-off service such as a supply teacher or a volunteer.

#### 5. Equality statement

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

We give special consideration to children who:

- have special educational needs (SEN) or disabilities;
- are young carers;
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;

- have English as an additional language;
- are known to be living in difficult situations, for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- are at risk of FGM, sexual exploitation, forced marriage, or radicalization;
- are asylum seekers;
- are at risk due to either their own or a family member's mental health needs; and
- are looked after or previously looked after.

### **Students with special educational needs and disabilities**

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

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- students being more prone to peer group isolation than other students;
- the potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Children who have a social worker due to safeguarding or welfare needs may be vulnerable to further harm due to experiences of adversity and trauma, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and positive mental health. Our school will identify the additional needs of these children and provide extra monitoring and pastoral support to mitigate these additional barriers.

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. Where it is known that children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can impact on their mental health, behaviour and education. Our school will identify the additional needs of these children and provide extra monitoring and pastoral support to mitigate these additional barriers. Where necessary, referrals will be made to mental health professionals for further support.

Our school is part of Sussex Police Operation Encompass (see Appendix C) and we will support individual children as necessary when we receive a notification of an incident of domestic violence or abuse.

Our school takes a trauma informed approach to supporting children, considering their lived experience, and factoring this into how we can best support them with their welfare and engage them with their learning.

## **6. Roles and responsibilities**

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

### **All staff**

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- our systems which support safeguarding, including this Child Protection and Safeguarding Policy and Procedure, the Staff Discipline and Code of Conduct Policy, the role and identity of the Designated Safeguarding Lead (DSL) and Deputy Designated

Safeguarding Lead (DDSL), the Behaviour for Learning and Exclusion Policies and the safeguarding response to children who go missing from education;

- the early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- the process for making referrals to Local Authority Children's Social Care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals; and
- the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

Staff should ensure that the DSL is:

- kept informed of any incident of physical intervention with a child and will be aware of behaviour plans for specific children;
- kept informed of attendance patterns, and where there are concerns for individual children the response to this will be considered within the context of safeguarding; and
- kept informed of arrangements for first aid and children with medical conditions and is alerted where a concern arises, such as an error with the administering of medicines or intervention, or repeated medical appointments being missed, or guidance or treatments not being followed by the parents or the child.

### **The Designated Safeguarding Lead (DSL)**

The Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team. The DSL is Miss Jemma Graffham. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL is contactable via email, or safeguarding mobile phone. Contact details can be found on the back of staff ID badges.

When the DSL is absent, the Deputy DSL, Mrs Carley Hawkins, will act as cover. If the DSL and Deputy DSL are not available, Mr Stuart Reeves, Head Teacher, will act as cover (for example, during out-of-hours/out-of-term activities).

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

- provide advice and support to other staff on child welfare and child protection matters;
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- contribute to the assessment of children; and
- refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly.

The school has structures and systems in place, such as scheduled meetings and shared databases, to ensure that the DSL has oversight of areas of school organisation which may not fall within their remit, but may impact upon effective safeguarding such as behaviour, attendance, medical needs/first aid, SEND and bullying. Information from all of these areas will be factored into safeguarding decision-making for individual children.

Systems are in place to ensure that hate incidents, e.g. racist, homophobic, transphobic gender or disability-based bullying, are reported, recorded and considered under safeguarding arrangements by the DSL.

The DSL links with curriculum leads, such as PSHE and ICT, to ensure that the curriculum supports the wellbeing and resilience of students and teaches them about risk assessment and safeguarding issues, such as healthy relationships and online safety.

The DSL will also keep the Head Teacher informed of any issues, and liaise with Local Authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL and Deputy DSL are set out in their job descriptions.

### **The Governing Board**

The Governing Board will approve this Child Protection and Safeguarding Policy and Procedure at each review, ensure it complies with the law and hold the Head Teacher to account for its implementation.

The Governing Board have appointed a senior board level (or equivalent) lead, Mr Matt West, to monitor the effectiveness of this policy in conjunction with the full Governing Board. This is always a different person to the DSL. The lead Governor for safeguarding and child protection will undergo live Governor Services training prior to, or soon after, appointment to the role; this training will be updated every three years.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher, where appropriate. All Governors will read Keeping Children Safe in Education.

### **The Head Teacher**

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

- ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction;
- communicating this policy to parents when their child joins the school and via the school website;
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly;
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- ensuring the relevant staffing ratios are met, where applicable; and
- making sure each child in the Early Years Foundation Stage is assigned a key person.

## **7. Confidentiality and information sharing**

The school recognises that all matters relating to child protection are confidential. However, it is essential that people working with children can confidently share information as part of their day-to-day work. This is necessary to not only safeguard and protect children from harm but also to work together to support families to improve outcomes for all.

The school may have to share information about parents, such as their medical history, disability or substance misuse issues, for investigations of child abuse carried out by Children's Social Care. The Head Teacher or DSL will disclose any information about a student to other members of staff on a need-to-know basis only.

The school will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps the school to be as well informed as possible when working to support children.

Timely information sharing is essential to effective safeguarding. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

If staff need to share special category personal data, the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

#### **All staff members:**

- must be aware that they cannot promise a child that they can keep secrets which might compromise the child's safety or well-being;
- have a professional responsibility to share information with other agencies in order to safeguard children; and
- who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.

The school will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.

#### **Inter-Agency Working**

The school will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the Police and Children's Social Care. The school will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children. The school will participate in safeguarding practice reviews (previously known as serious case reviews), other reviews and file audits as and when required to do so by the East Sussex Local Safeguarding Children Board. The school will ensure that we have a clear process for gathering the evidence required for reviews and audits, embedding recommendations into practice and completing required actions within agreed timescales.

The school will complete a self-assessment audit of the school's safeguarding arrangements at frequencies specified by the ESSCP and using the audit tool provided by the Standards and Learning Effectiveness Service for this purpose.

### **8. Recognising abuse and taking action**

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

Please note: in this and subsequent sections, any references to the DSL should also be taken to mean the DSL (or Deputy DSL).

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

Make a referral to Children's Social Care and/or the Police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly. Contact details are provided in Section 1 of this policy.

### **If a child makes a disclosure to you**

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

- listen to, and believe them. Allow the child time to talk freely and do not ask leading questions;
- stay calm and do not show that you are shocked or upset;
- tell the child that they have done the right thing in telling you. Do not tell them they should have told you sooner;
- explain what will happen next and that you will have to pass this information on. **Do not promise to keep the information a secret;**
- write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not include your own judgement; and
- record the disclosure on MyConcern. Alternatively, if appropriate, make a referral to Children's Social Care and/or the Police directly, and tell the DSL as soon as possible that you have done so.

### **If you discover that female genital mutilation (FGM) has taken place or a student is at risk of FGM**

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix 4.

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a student under 18, must immediately report this to the Police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and involve Children's Social Care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a student under 18, must speak to the DSL and follow our local safeguarding procedures. The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

**Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out or discovers that a student age 18 or over appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures. A referral must go to the Police and Adult's Social Care must be informed.

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

Where possible, speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children's Social Care. You can also seek advice at any time from the NSPCC helpline on 0800 800 5000. Staff can make a referral to Local Authority Children's Social Care directly, if appropriate. Share any action taken with the DSL as soon as possible.

**Early help:** If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. The DSL will keep the case under constant review and the school will consider a referral to Local Authority Children's Social Care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

**Referral:** If it is appropriate to refer the case to Local Authority Children’s Social Care or the Police, the DSL will make the referral or support you to do so. If you make a referral directly, you must tell the DSL as soon as possible. The Local Authority will make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded. If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.

### **If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or is not in immediate danger, where possible speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or seek advice from Local Authority Children’s Social Care. Make a referral to Local Authority Children’s Social Care directly; if appropriate (see ‘Referral’ above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the Local Authority Children’s Social Care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Governors can call to raise concerns about extremism with respect to a student. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Please note: this email address is not for use in emergency situations.

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

- think someone is in immediate danger;
- think someone may be planning to travel to join an extremist group; or
- see or hear something that may be terrorist-related.

### **Concerns about a staff member or volunteer**

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Head Teacher. If the concerns/allegations are about the Head Teacher, speak to the Chair of Governors.

The Head Teacher/Chair of Governors will then follow the procedures set out in Appendix 3, if appropriate. Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix 3).

### **Allegations of abuse made against other students - peer on peer abuse**

The school recognises that children are capable of abusing their peers. Abuse will never be tolerated or passed off as ‘banter’, ‘just having a laugh’ or ‘part of growing up’. The school also recognises the gendered nature of peer-on-peer abuse i.e. that it is more likely that girls will be victims and boys will be perpetrators. However, all peer-on-peer abuse is unacceptable and will be taken seriously. Most cases of students hurting other students will be dealt with under the school’s Behaviour for Learning and Exclusion Policy, but this Child Protection and Safeguarding Policy and Procedure will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- is serious, and potentially a criminal offence;
- could put students in the school at risk;
- is violent;

- involves students being forced to use drugs or alcohol; or
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting).

If a student makes an allegation of abuse against another student you must record the allegation and tell the DSL, but do not investigate it.

The DSL will:

- contact the Local Authority Children’s Social Care team and follow its advice, as well as the Police if the allegation involves a potential criminal offence;
- put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed; and
- contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate.

The ‘Protocol for Managing Peer on Peer Harmful Sexual Behaviour in Schools, Settings and Colleges- December 2018’ provides further guidance. This protocol has been produced jointly by the SLES Safeguarding team, SWIFT specialist services, SPOA, MASH and Early Help.

The school will minimise the risk of peer-on-peer abuse by:

- challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- being vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys;
- ensuring the curriculum helps to educate students about appropriate behaviour and consent;
- ensuring students know they can talk to staff;
- ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy; and
- working closing with the WISE project to provide student with additional support.

### Sexting

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately. You must **not**:

- view, download or share the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL;
- delete the imagery or ask the student to delete it;
- ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility);
- share information about the incident with other members of staff, the student(s) it involves or their, or other, parents; and
- 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 student(s) that they will receive support and help from the DSL. Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- whether there is an immediate risk to student(s);
- if a referral needs to be made to the Police and/or Children’s Social Care;
- if it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed);

- what further information is required to decide on the best response;
- whether the imagery has been shared widely and via what services and/or platforms (this may be unknown);
- whether immediate action should be taken to delete or remove images from devices or online services;
- any relevant facts about the students involved which would influence risk assessment;
- if there is a need to contact another school, college, setting or individual; and
- whether to contact parents of the students involved (in most cases parents should be involved).

The DSL will make an immediate referral to Police and/or Children's Social Care if:

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

If none of the above apply then the DSL, in consultation with the Head Teacher and other members of staff as appropriate, may decide to respond to the incident without involving the Police or Children's Social Care. If at the initial review stage a decision has been made not to refer to Police and/or Children's Social Care, the DSL will conduct a further review. They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks. If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the Police immediately.

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

**Referring to the Police:** If it is necessary to refer an incident to the Police, this will be done by dialing 101.

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

**Curriculum coverage:** Students are taught about the issues surrounding sexting as part of the school's PSHEE education and computing programmes. Students also learn the strategies and skills needed to manage specific requests or pressure to provide (or forward) such images and the receipt of such images. This policy on sexting is also shared with students so they are aware of the processes the school will follow in the event of an incident.

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

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a

continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her / his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex, or penetration with conditions such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

When referring to sexual harassment, we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and / or make them feel intimidated, degraded or humiliated and / or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and / or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media;
  - sexual exploitation; coercion and threats; and
  - upskirting.

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12<sup>th</sup> April 2019. Upskirting is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification,

or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone, of any gender, can be a victim.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

As a school, where we discover incidents of sexualised behaviours between children, we will respond to this in line with the East Sussex Protocol for Managing Peer on Peer Harmful Sexual Behaviour in Schools, Settings and Colleges and with reference to the following documents:

- Brooks Traffic Light Tool;
- ESCC Communicating with parents: Toolkit for guided conversations: harmful sexual behaviour;
- ESCC Supporting children and young people who have displayed harmful sexual behaviour; and
- ESCC Supporting children who have experienced sexual abuse.

## 9. Additional information

### Notifying parents

Where appropriate, the school will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If the school believes that notifying the parents would increase the risk to the child, we will discuss this with the Local Authority Children's Social Care team before doing so.

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

### Mobile phones and cameras

Staff are allowed to bring their personal mobile phones to school for their own personal use, but will limit personal use to non-contact time when students are not present. However, staff members can use their personal mobile phones to access EduLink and complete registers during lesson time.

Staff will not take pictures or recordings of students on their personal mobile phones or personal cameras. The school will follow the General Data Protection Regulation (GDPR) and Data Protection Act (DPA) 2018 when taking and storing photos and recordings for use by the school.

Under no circumstances should staff share their personal contact details with a student or parent. Where staff need to contact a parent using their mobile phone, for example, while on a school trip, they will ensure that their number is withheld (*add 141 to the number before dialling*) and only use voice calls, not text messages. No parent should be contacting staff directly other than via the main school switchboard or via school email. Staff must not have the contact details of parents saved to their personal phone; these should only be accessed when needed through EduLink.

### Effective practices when using social media sites

Members of staff should:

- use caution when posting information on social networking sites and other online forums;

- consider refraining from identifying themselves as working for the school as posted content could bring the school into disrepute;
- take care that their interaction on social media does not damage working relationships between members of staff, students at the school, their families and other stakeholders and/or working partners of the school;
- exercise caution, if also parents at the school, when interacting with other parents on social media to ensure that professional boundaries are not compromised;
- maintain professional standards by communicating with student and parents electronically at appropriate times of the day and through established education platforms, for example, a web page dedicated to school programme, project or class rather than via a personal profile;
- decline student-initiated 'friend requests' and not issue 'friend requests' to students nor communicate with students on any social network site or similar website or forum;
- maintain a formal, courteous and professional tone in all communications with students to ensure that professional boundaries are maintained;
- make it clear that any personal views are not necessarily those of the school if posting an item about an aspect of the school, for which you have express permission from the Head Teacher; and
- not accept any current student of any age or any ex-student of the school under the age of 18 as a friend, follower, subscriber or similar on any personal social media account.

### **Site security**

All staff members have a responsibility to ensure the school buildings and grounds are secure and for reporting concerns that may come to light. The school checks the identity of all visitors and volunteers coming into school. Visitors are expected to sign in and out in either the Primary School Office visitors' log or the Secondary and Sixth Form Office visitors' log and to display a visitor badge at all times while on the school site.

Any individual who is not known or identifiable will be challenged for clarification and reassurance. The school will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

### **The use of 'Reasonable Force' and restrictive physical interventions**

There are circumstances when it will be appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

Further guidance on the use of reasonable force and restrictive physical interventions should be sought within the Use of Reasonable Force and Restrictive Physical Interventions Policy, with all cases of intervention being recorded. When managing incidents, the school will consider whether to liaise with the Local Authority Designated Officer (LADO), where it is thought that the physical intervention may lead to an allegation.

## 10. Complaints and concerns about school safeguarding policies

### Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 3).

### Other complaints

The school tries to resolve concerns or complaints by informal means wherever possible.

Where this is not possible, formal procedures will be followed. The school will aim to give the complainant the opportunity to complete the school's complaints procedure in full.

To support this, the school will ensure the existence of the Complaints Policy and Procedure is publicised and made available on the school website. This policy applies to children in the whole school, including those in the Early Years Foundation Stage (EYFS) and fits in with the school's ethos and values. Full details can be found within the Complaints Policy and Procedure.

### Whistleblowing

The school recognises that children cannot be expected to raise concerns in an environment where staff members fail to do so. The school will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary, the staff member will speak with the Head Teacher, the Chair of Governors or with the Local Authority Designated Officer (LADO). The school has a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice. The school will actively seek the views of children, parents and staff members on child protection arrangements through surveys, questionnaires and other means.

The school has a separate Whistleblowing Policy and procedure which applies to all staff (which throughout this policy and procedure includes any adult working within the school, whether directly employed, providing a contracted service, or a one-off service such as a supply teacher or a volunteer) and Governors. Other individuals performing functions in relation to the organisation, such as contractors, should have access to the policy and procedure.

It is important to the school that any fraud, misconduct or wrongdoing by staff or Governors of the school is reported and properly dealt with. The Governing Board will, therefore, respond to all individuals who raise any genuine concerns that they may have about the conduct of others in the school, **which are in the public interest**. The Whistleblowing Policy and procedure sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

## 11. Record-keeping

Accurate and timely record-keeping is an important part of the school's accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children. Records should be factual, accurate, relevant, up-to-date and auditable. They should support monitoring, risk assessment and planning for children and enable informed and timely decisions about appropriate action to take. The school will hold records in line with the school's Records Management Schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on MyConcern. If a staff member is in any doubt about whether to record

something, discuss this with the DSL. The referral to the Safeguarding Team should be made via the My Concern webpage:

<https://www.myconcern.education/Account/Login?ReturnUrl=%2f>.

Once received, the referral will be actioned by the relevant staff and monitored through the MyConcern software.

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school in line with the school's Records Management Schedule. If students leave Gildredge House to start at a new school or college, files are transferred securely to the student's new institution.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their Child Protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Electronic records are held within MyConcern, and paper records within a locked filing cabinet in the DSL's office.

## 12. Training

### All staff

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

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

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

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

The induction and ongoing training of staff will include the following key aspects:

- Staff understand the difference between a safeguarding concern and a child in immediate danger or at risk of significant harm.
- Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- When concerned about the welfare of a child, staff should always act in the best interests of the child.
- Staff understand that children's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse.

- Staff understand that children who have a social worker may be educationally disadvantaged and face barriers to attendance, learning, behaviour and positive mental health.
- Staff understand that mental health issues for children may be an indicator of harm or abuse, or where it is known that a child has suffered harm or abuse this may impact on their mental health, behaviour and education.
- Staff understand that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL (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, and serious youth violence.
- Staff know how best to respond to a child who makes a disclosure of abuse or harm.
- If staff are unsure, they should always speak to the DSL or Deputy DSL.
- If staff have any concerns about a child's welfare, they should act on them immediately.
- Staff should not assume a colleague or another professional will take action.
- The DSL or Deputy DSL should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or Deputy DSL) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the Senior Leadership Team and/or take advice from SPoA. In these circumstances, any action taken should be shared with the DSL (or Deputy DSL) as soon as is practically possible.

### **The DSL, Deputy DSL and Primary Safeguarding Officer**

The DSL, Deputy DSL and Primary Safeguarding Officer will undertake child protection and safeguarding training at least every two years. In addition, they will update their knowledge and skills at regular intervals and at least annually, for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments. They will also undertake Prevent awareness training.

### **Governors**

All Governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. As the Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher, they receive training in managing allegations for this purpose.

### **Recruitment interview panels**

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

### **Staff who have contact with students and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## Appendices

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

## Appendix 1: Types of Abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

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

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

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

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

Our school has robust recruitment and vetting procedures to help prevent unsuitable people from working with children. Our job advertisements and application packs make explicit reference to the school's commitment to safeguarding children, including compliance with the Disclosure and Barring Service (DBS) process and clear statements in the Job Description and Person Specification about the staff member's safeguarding responsibilities.

The school will record all information on the checks carried out on an individual in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. The school follows requirements and best practice in retaining copies of these checks, as set out below. The Head Teacher and the nominated Governor for child protection (Safeguarding Lead Governor) are responsible for ensuring that our SCR is accurate and up-to-date.

### New staff

When appointing new staff, the school will:

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

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

The school will ask for written information about previous employment history and check that information is not contradictory or incomplete. The school will seek references on all short-listed candidates before interview; these will be scrutinised and any concerns resolved before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

**Regulated activity** means a person who will be:

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

### Existing staff

If the school has concerns about an existing member of staff's suitability to work with children, the school will carry out all the relevant checks as if the individual was a new member of staff. The school will also do this if an individual moves from a post that is not regulated activity to one that is regulated activity. The school will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

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

### Agency and third-party staff

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

### Contractors

The school will ensure that any contractor, or any employee of a 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; or
- 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.

The school will obtain the DBS check for self-employed contractors. The school will not keep a copy of an individual's DBS certificate 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.

The school will check the identity of all contractors and their staff on arrival at the school. For self-employed contractors, such as visiting music teachers or sports coaches, the school will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification Regulations 2018 and Childcare Act 2006. Where the school decides that an individual falls outside of the scope of these regulations and such checks are not carried out, the school will retain a record of the assessment. This will include an 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, the school will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, the school will obtain written confirmation from the training provider that the 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 Childcare Disqualification Regulations 2018 and Childcare Act 2006.

### Volunteers

The school 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 and retain a record of this risk assessment; and
- ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification Regulations 2018 and Childcare Act 2006. Where the school decides that an individual falls outside of the scope of these regulations and such checks are not carried out, the school will retain a record of the assessment. This will include the 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 only 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 Governor at a maintained school). 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 check.
- Right to work in the UK check.
- Other checks deemed necessary if they have lived or worked outside the UK.

### Staff working in alternative provision settings

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

### Adults who supervise students on work experience

When organising work experience, the school will ensure that policies and procedures are in place to protect children from harm. The school will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student 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 3: Allegations of Abuse Made Against Staff

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

- behaved in a way that has harmed a child, or may have harmed a child; or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the Police.

The school will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

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

### Suspension

Suspension 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 it might be grounds for dismissal. In such cases, the school will only suspend an individual if all other options available have been considered and there is no reasonable alternative.

Based on an assessment of risk, the school 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; or
- 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 have been consulted.

### 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

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Head Teacher (or Chair of Governors where the Head Teacher is the subject of the allegation) - the 'case manager' - will take the following steps:

- Immediately discuss the allegation with the Designated Officer at the Local Authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the Police and/or Children's Social Care services. The case manager may, on occasion, consider it necessary to involve the Police *before* consulting the Designated Officer, for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the Designated Officer as soon as practicably possible after contacting the Police.
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the Designated Officer and the Police or Children's Social Care services, where necessary. Where the Police and/or Children's Social Care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, Police and/or Children's Social Care services, as appropriate.

**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 one 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, the decision must be recorded 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 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 of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- 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.

The school will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or

abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, the school 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 Governing Board 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.

### Timescales

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

### 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 case manager and the school's personnel adviser will discuss with the Designated Officer whether to 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 case manager and personnel adviser will discuss with the Designated Officer 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 or malicious allegations:** If an allegation is shown to be deliberately invented, or malicious, the Head Teacher, or other appropriate person in the case of an allegation against the Head Teacher, will consider whether any disciplinary action is appropriate against the student(s) who made it, or whether the Police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student.

### Confidentiality

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 Local Authority's Designated Officer, 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 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; and
- 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. Such records will include:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved; and
- notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, the school will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. The school 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. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### References

When providing employer references, the school will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

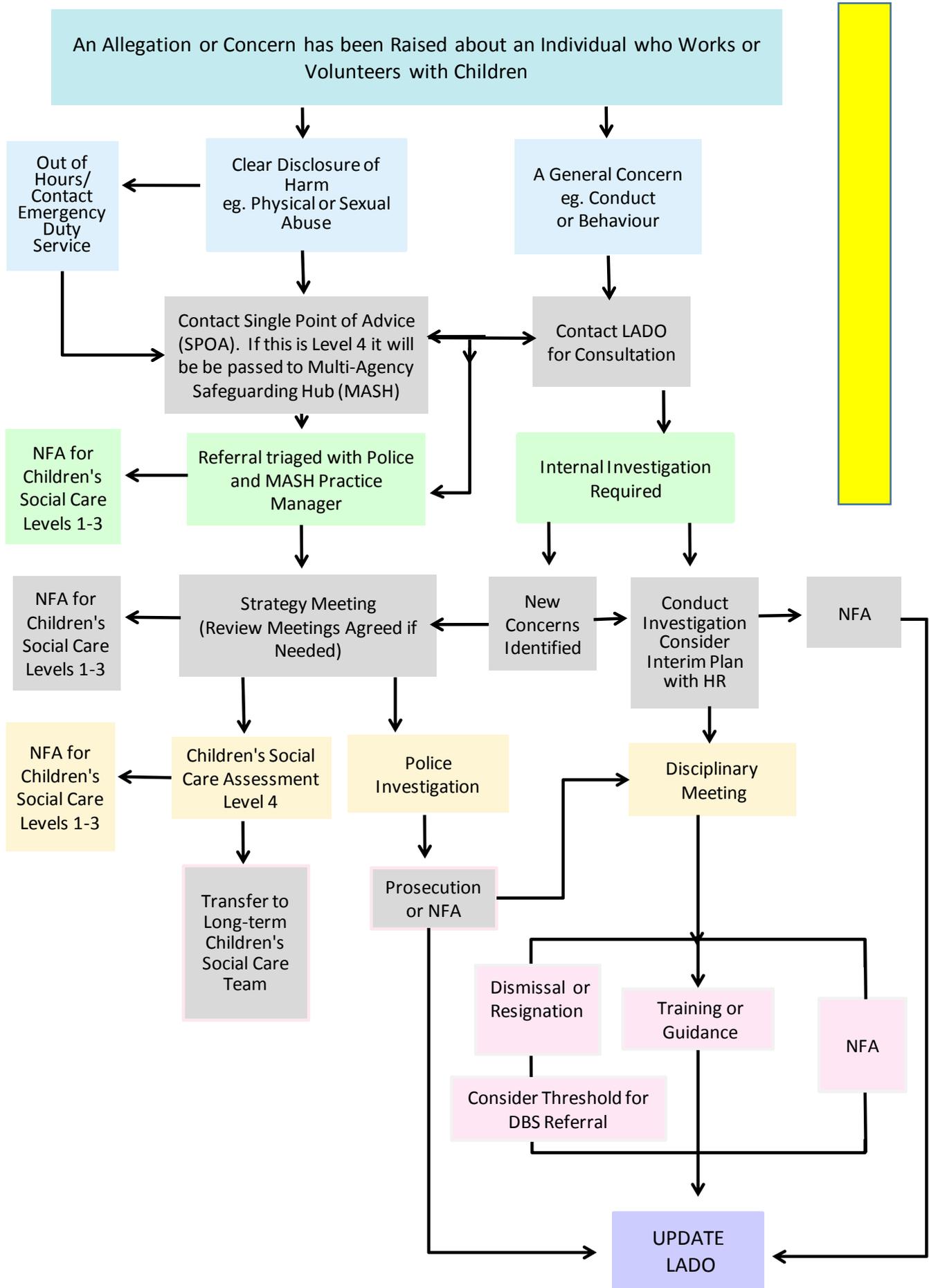
### Learning lessons

After any cases where the allegations are *substantiated*, the school will review the circumstances of the case with the Local Authority's Designated Officer to determine whether there are any improvements that can be made 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; and
- the use of suspension when the individual is subsequently reinstated. The school will consider how future investigations of a similar nature could be carried out without suspending the individual.

## Managing allegations flowchart



## Appendix 4: Specific Safeguarding Issues

School staff members need to be aware of specific safeguarding issues and be alert to any risks. Specific issues are detailed within Annex A of Keeping Children Safe in Education September 2020 and staff should read this document. Further information about the local procedures in response to these issues can be found within Section 8 of the Pan-Sussex Child Protection and Safeguarding Procedures [here](#).

Annex A of Keeping Children Safe in Education September 2020 contains various hyperlinks or references to further sources of information and support with specific safeguarding issues, which have not been duplicated within this appendix.

Within this appendix are the key considerations for specific safeguarding issues, not all of which are listed within Annex A of Keeping Children Safe in Education September 2020.

### Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds. These guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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

Schools need to be mindful of the stress of these situations and signposting parents to external resources where necessary. Equally, the impact upon staff of managing these situations also needs to be considered.

### Children missing from education

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

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

- are at risk of harm or neglect;
- are at risk of forced marriage or FGM;
- come from Gypsy, Roma, or Traveller families;
- come from the families of service personnel;
- go missing or run away from home or care;
- are supervised by the youth justice system;
- cease to attend a school; or
- come from new migrant families.

The school will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. The school must inform the Local Authority of any student who fails to attend regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the Local

Authority or in default of such agreement, at intervals determined by the Secretary of State. The school will inform the Local Authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the Local Authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the Local Authority Children's Social Care team, and the Police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

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

If a member of staff suspects CSE, they must discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's Children's Social Care team and the Police, if appropriate.

Indicators of sexual exploitation can include a child:

- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections or becoming pregnant;
- displaying inappropriate sexualised behaviour;
- suffering from changes in emotional wellbeing;
- misusing drugs and/or alcohol;
- going missing for periods of time, or regularly coming home late; or
- regularly missing school or education, or not taking part in education.

### **Child criminal exploitation**

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

violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children:

- being forced to work in cannabis factories;
- being coerced into moving drugs or money across the country; or
- forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

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

### County lines

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

Exploitation is an integral part of the county lines offending model with children and coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, student referral units, special educational needs schools, children’s homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

### Domestic abuse

The cross-government definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional.

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. Exposure to 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Operation Encompass is coordinated by Sussex Police. 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 support to be given to the child according to their needs. When approaching conversations with children or adults about domestic violence and abuse we will do so in line with the ESCC Domestic Abuse Toolkit: Supported Conversations with Young People and their Carers.

### Homelessness

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

The DSL and Deputy DSL will be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures). Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into Children's Social Care where a child has been harmed or is at risk of harm. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to Children's Social Care.

In most cases, school 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 services will be the lead agency for these young people and the Designated Safeguarding Lead (DSL) or a Deputy DSL should ensure appropriate referrals are made based on the child's circumstances.

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

So-called 'honour-based' violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

### FGM

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

Section 8 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- a student confiding in a professional that FGM has taken place;
- a mother/family member disclosing that FGM has been carried out;
- a family/student already being known to social services in relation to other safeguarding issues;
- A girl:
  - having difficulty walking, sitting or standing, or looking uncomfortable;
  - finding it hard to sit still for long periods of time (where this was not a problem previously);

- spending longer than normal in the bathroom or toilet due to difficulties urinating;
- having frequent urinary, menstrual or stomach problems;
- avoiding physical exercise or missing PE;
- being repeatedly absent from school, or absent for a prolonged period;
- demonstrating increased emotional and psychological needs, for example, withdrawal or depression, or significant change in behaviour;
- being reluctant to undergo any medical examinations;
- asking for help, but not being explicit about the problem; or
- talking about pain or discomfort between her legs.

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

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

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

Teachers must personally report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's Designated Safeguarding Lead (DSL) or Deputy DSL and involve Children's Social Care as appropriate. The duty does not apply in relation to at risk or suspected cases i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence, or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

### **Forced marriage**

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

Staff will receive training around forced marriage and the presenting symptoms. The school is aware of the 'one chance' rule, i.e. the school may only have one chance to speak to the potential victim and only one chance to save them.

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

- speak to the student about the concerns in a secure and private place;
- activate the local safeguarding procedures and refer the case to the Local Authority's Designated Officer;
- seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmufco.gov.uk](mailto:fmufco.gov.uk); and
- refer the student to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

### Online safety

The use of technology has become a significant component of many safeguarding issues. The school has an Online Safety Policy which includes guidance for all students in relation to online safety and using the internet and social media. There are appropriate filtering and monitoring systems in place. Staff are encouraged to report their concerns if they believe that children are using the internet, mobile technology or social media inappropriately, for example, sexting. In these instances, the Designated Safeguarding Lead (DSL) will review the circumstances and speak with parents and make appropriate referrals as necessary. For further information, see Annex C of Keeping Children Safe in Education.

### Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

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

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

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

- refusal to engage with, or becoming abusive to, peers who are different from themselves;
- becoming susceptible to conspiracy theories and feelings of persecution;
- changes in friendship groups and appearance;
- rejecting activities they used to enjoy;
- converting to a new religion;
- isolating themselves from family and friends;
- talking as if from a scripted speech;

- an unwillingness or inability to discuss their views;
- a sudden disrespectful attitude towards others;
- increased levels of anger;
- increased secretiveness, especially around internet use;
- expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- accessing extremist material online, including on social media sites such as Facebook or Twitter;
- possessing extremist literature; or
- being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

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

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

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

### The Prevent duty

All schools are subject to a duty under Section 26 of the Counter-Terrorism and Security Act (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 is seen as part of the schools’ wider safeguarding obligations. Designated Safeguarding Leads (DSLs) and other senior leaders must familiarise themselves with the Revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76 which are specifically concerned with schools (and also covers childcare).

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. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages. The school’s Designated Safeguarding Lead (DSL) and any Deputy DSLs are aware of local procedures for making a Channel referral.

### Private fostering

Parents often fail to notify schools about private fostering arrangements even though they are legally required to notify Children’s Services. Often this is because they are unaware of the requirements. They believe that this is a private family arrangement which does not concern anybody else.

**Private fostering definition:** Private fostering occurs when a child under 16 (or 18 if the child is disabled) is cared for and lives with an adult who is not a relative for 28 days or more. This could be a step parent (by marriage or civil partnership), grandparent, step grandparent, brother, sister, uncle or aunt.

Private fostering is a private arrangement made by the parent(s), or those with parental responsibility for someone to care for their child because they are unable to do so (permanently or temporarily). This may be due to a number of reasons such as parental ill-health, a parent going abroad or into prison, a child being brought to the UK to study English, or the relationship between the child and parent has broken down.

School staff play an essential role in identifying privately fostered children. If a staff member knows a child is being privately fostered, they should advise the parent that they have a legal obligation to report the arrangement to Children Social Care at least six weeks before it happens or within 48 hours if the arrangement is current, having been made in an emergency.

Alert the DSL who will ensure this is followed up with Children's Social Care and the arrangement is assessed, approved and monitored.

### Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, the school will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

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

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

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

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

### Non-collection of children

If a child is not collected at the end of the day, the following procedures are followed:

- The child's file is checked for any information about changes to the normal collection routines.
- If no information is available, parents are contacted at home or at work on their given numbers.
- The child does not leave the premises with anyone other than those named in the contact details provided by parents, as above.
- If the school has been unable to make contact with anyone able to collect the child, the following people will be informed: the School Office, the Head Teacher and the Designated Safeguarding Lead (DSL).
- Social Services should be contacted if no parent can be contacted. The school will do this after 5.30pm.
- The child is kept at the school in the care of a member of staff who has undergone enhanced DBS clearance with barred list information until the child is safely collected either by the parents or by a social care worker.
- Under no circumstances do staff go to look for the parent; nor do they take the child home with them.
- A full written report of the incident is recorded through MyConcern.

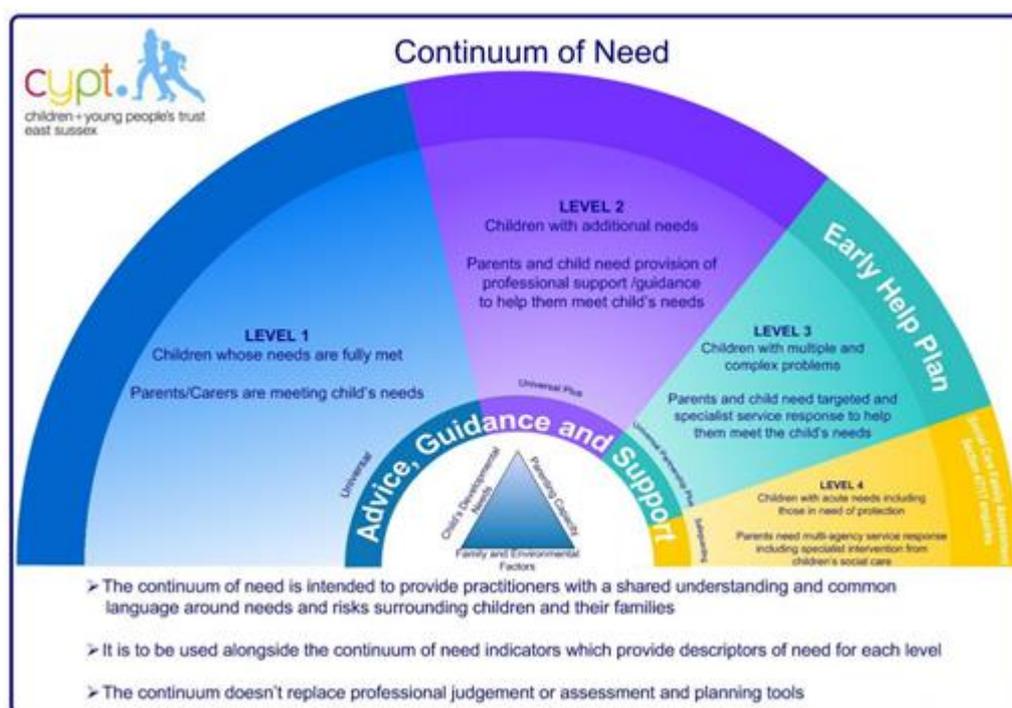
On occasions when parents who normally collect the child are not able to collect them, they are to provide the school with written details of the name of the person who will be collecting their child. The school will agree with parents how to verify the identity of the person who is to collect their child.

Further details with regards to this and missing students can be found within the EYFS and Primary Uncollected Child Policy and Procedures.

## Appendix 5: Safeguarding Children Continuum of Need

The Safeguarding Children Continuum of Need has been developed so that everyone working with children in East Sussex has a common language for understanding the needs and risks surrounding children and their families.

The Continuum of Need shows that a child's or family's additional needs can be on a range from one to four, and that needs can shift from early help to child protection and back to preventative early help. It covers children whose needs are increasing as well as children whose needs are decreasing after Children's Social Care involvement. The Continuum of Need will help practitioners to identify the right level of support for the child in the least intrusive way while keeping the child safe.



The Continuum of Need identifies four levels of need:

### Level 1:

- Children who are achieving expected outcomes.
- Their needs are met by their parents and by accessing universal services such as health and education.
- They do not have additional needs.

### Level 2:

- Children with additional needs.
- Parents need professional support or guidance to help them meet their children's needs.
- Extra support can usually be provided by agencies that already know the family, e.g. their pre-school, school or college or NHS community services such as Health Visiting.

### Level 3:

- Children with multiple and complex needs.
- Children and parents need targeted early help or specialist services to meet the children's needs.

- Needs are met through multi-agency support and the use of Early Help Plans.

**Level 4:**

- Children with acute needs, including those in need of protection.
- Children and parents need multi-agency responses which include specialist intervention from Children's Social Care through the family assessment process.

By referring to the Continuum of Need and indicators, the school can identify when assessment and support for a child and family need 'stepping up' to a referral to Social Care and when the needs of a child and their family have been reduced enough for them to be 'stepped down' to early help services.