



# Safeguarding & Child Protection Policy 2024/25

## Document control

<b>This document has been approved for operation by:</b>	Kathryn Towers
<b>Date of last review</b>	Sept 2024
<b>Date of next review</b>	Sept 2025
<b>Review period</b>	1 Year
<b>Status</b>	Statutory
<b>Owner</b>	Tower Learning Centre Independent School
<b>Version</b>	4

## Contents

Key safeguarding information.....	6
Introduction .....	7
Aims.....	8
Who is responsible for the policy? .....	8
School approach .....	9
Terminology .....	9
The Proprietor's commitment .....	11
Role of Tower Learning Centre Independent School.....	12
Role of the Head teacher .....	14
Role of the designated safeguarding lead(s) .....	14
Role of staff.....	16
Confidentiality .....	17
Role of the every child matters group.....	18
Safeguarding information for pupils to build resilience, awareness and keep children safe .	19
Safeguarding information for parents .....	20
Emergency contacts for children .....	20
Safer recruitment .....	20
Use of school or college premises for non-school/college activities.....	20
Support for those involved in a child protection issue .....	21
External speakers and charities .....	22
Use of mobile phones and cameras .....	22
Using ICT.....	23
Induction .....	24
Training.....	24
Monitoring safeguarding arrangements.....	25
Extended school, off-site arrangements and alternative providers.....	25
Related school policies .....	26
Concerns about safeguarding practices .....	26
Complaints.....	27
Recognising abuse .....	27
Recognising extremism and radicalisation .....	28
Guidance on specific types of abuse.....	30
Child sexual exploitation .....	30
Female genital mutilation.....	31
Forced marriage .....	32

Child-on-child abuse.....	32
Faith abuse.....	36
Fabricated illness .....	36
Child criminal exploitation: serious violence/county lines .....	36
So-called 'honour-based' violence .....	37
Homelessness.....	37
Upskirting .....	37
Online risks.....	38
Child abduction and community safety incidents.....	39
Self-harm.....	39
Further information of specific safeguarding issues .....	40
Recognising children who may be particularly susceptible .....	41
Children who are looked after .....	41
Children with special educational needs and disabilities .....	41
Other considerations .....	42
Contextual Safeguarding.....	42
Children absent from education for prolonged periods or repeated occasions .....	42
Dealing with safeguarding concerns and incidents.....	43
Responding to a disclosure .....	43
Responding to a concern that a child is at risk.....	44
Reporting safeguarding concerns .....	44
Responding to safeguarding concerns.....	46
Allegations against members of staff.....	47
Low Level Concerns.....	48
Record keeping.....	48
Record transfers.....	50
Access to child protection files.....	50
Retention of child protection files .....	51
Safeguarding procedures in the event of a partial or full school closure .....	52
Appendix 1: Designated safeguarding lead responsibilities .....	53
Appendix 2: Designated looked after children (LAC) teacher responsibilities .....	56
Appendix 3: Safe working practices .....	59
Appendix 4: Safeguarding and Prevent Checklist.....	64
Appendix 5a: Staff safeguarding declaration .....	71
Appendix 5b: Head Teacher and Proprietor safeguarding declaration form.....	72
Appendix 6: Safeguarding concern form .....	73
Appendix 7: Safeguarding Risk Assessment – Allegations Against Staff.....	80

Appendix 8: Safeguarding incident involving a member of staff and pupil in school.....	84
Appendix 9: Child protection file – front sheet .....	85
Appendix 10: Child protection file – removal of information record .....	86
Appendix 11: Child protection file – chronology of significant events .....	87
Appendix 12: Child protection file - record of child protection file transfer .....	88
Appendix 13: Safeguarding procedures in the event of a partial or full school closure.....	89
Appendix 14: Contextual Safeguarding- Safety Mapping tool instructions.....	90

## Key safeguarding information

Key Staff	
Designated safeguarding lead	Natalie Partington natalie@tower-learning.co.uk
Deputy designated safeguarding lead(s)	Kim McCormack
Designated Prevent lead(s)	Natalie Partington
Designated teacher for looked after children	Kim McCormack
Designated Operation Encompass lead ( <i>where applicable</i> )	Natalie Partington

Key External Contacts	
Police	101
Local authority children's social care	Blackpool Children's Social Care Bickerstaffe House Blackpool 01253 477299
Local authority designated officer (LADO)	Billy Evans/ Angela Phillipson <a href="mailto:lado@blackpool.gov.uk">lado@blackpool.gov.uk</a> 01253 478128
Safeguarding partner's website	<a href="http://www.blackpoolsafeguarding.org.uk/children">www.blackpoolsafeguarding.org.uk/children</a>
Channel/Prevent lead	Jeremy Mannino
Local children's Centre	Baines Children's Centre Penrose Ave Blackpool FY4 4DJ 01253 699085  Thames Children's Centre Severn Road Blackpool FY4 1ED 01253 361981

Key Documentation (including hyperlinks)	
<a href="http://npcc.police.uk">C&amp;YP schools guides (npcc.police.uk)</a>	
<a href="http://www.gov.uk">Channel and Prevent Multi-Agency Panel (PMAP) guidance - GOV.UK (www.gov.uk)</a>	
<a href="http://www.gov.uk">Child abuse concerns: guide for practitioners - GOV.UK (www.gov.uk)</a>	
<a href="http://www.gov.uk">Child sexual exploitation: definition and guide for practitioners - GOV.UK (www.gov.uk)</a>	
<a href="http://www.gov.uk">Children missing education - GOV.UK (www.gov.uk)</a>	
<a href="http://www.gov.uk">Data protection: toolkit for schools - GOV.UK (www.gov.uk)</a>	
<a href="#">DBS Identification Checking Guidelines</a>	
<a href="http://www.gov.uk">Disqualification under the Childcare Act 2006 - GOV.UK (www.gov.uk)</a>	
<a href="#">Education inspection framework</a>	
Key Documentation (including hyperlinks)	
<a href="#">Guidance for Safer Working Practice</a>	
<a href="#">Guidance for the Employment Of Overseas Applicants</a>	
<a href="#">Guidance for the Employment of Overseas Trained Teachers</a>	
<a href="http://publishing.service.gov.uk">HM Government Multi-agency practice guidelines: Handling cases of Forced Marriage (publishing.service.gov.uk)</a>	
<a href="http://www.gov.uk">Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)</a>	
<a href="http://www.gov.uk">Keeping children safe in education - GOV.UK (www.gov.uk)</a>	
<a href="http://www.gov.uk">Mental health and behaviour in schools - GOV.UK (www.gov.uk)</a>	
<a href="http://www.gov.uk">Multi-agency statutory guidance on female genital mutilation - GOV.UK (www.gov.uk)</a>	
<a href="#">Promoting Fundamental British Values Through SMSC</a>	
<a href="http://www.gov.uk">Protecting children from radicalisation: the prevent duty - GOV.UK (www.gov.uk)</a>	
<a href="http://www.gov.uk">Recruit teachers from overseas - GOV.UK (www.gov.uk)</a>	
<a href="#">Regulated activity with children in England (DBS)</a>	
<a href="http://publishing.service.gov.uk">Relationships Education, Relationships and Sex Education and Health Education guidance (publishing.service.gov.uk)</a>	
<a href="http://publishing.service.gov.uk">Searching, screening and confiscation (publishing.service.gov.uk)</a>	
<a href="http://www.gov.uk">Sexual violence and sexual harassment between children in schools and colleges - GOV.UK (www.gov.uk)</a>	
<a href="http://www.gov.uk">Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)</a>	
<a href="#">Teacher Status Checks - Employer Access Online</a>	
<a href="http://www.gov.uk">Teaching online safety in schools - GOV.UK (www.gov.uk)</a>	
<a href="#">The Use of Social Media for Online Radicalisation (Home Office, 2015)</a>	
<a href="http://www.gov.uk">Working together to safeguard children - GOV.UK (www.gov.uk)</a>	
Useful Sites	
<a href="#">Brook</a>	<a href="#">Home Office FGM e-learning</a>
<a href="#">UK Safer Internet Centre</a>	<a href="#">ThinkuKnow</a>
<a href="#">Educate Against Hate</a>	<a href="#">DisrespectNobody</a>
<a href="#">Home Office PREVENT e-learning</a>	<a href="#">NSPCC</a>

## Introduction

1. Tower Learning Centre Independent School recognises its moral and statutory responsibility to safeguard and promote the welfare of all pupils. In all our schools, we endeavour to provide a safe and welcoming environment where children are respected and valued.
2. This policy is written with regard to the key documentation named above.
3. It applies to all teaching and non-teaching members of staff and volunteers.
4. Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children. In line with this requirement, Tower Learning Centre Independent School has systems in place which are designed to:
  - prevent unsuitable people working with, or coming into contact with pupils within school
  - promote safe practice and challenge poor or unsafe practice
  - identify pupils who are suffering or likely to suffer significant harm<sup>1</sup> and take appropriate action with the aim of making sure they are kept safe both at home and at school
  - identify pupils who may be susceptible to messages of violence and radicalisation and take appropriate action to ensure early intervention challenges extreme ideologies
  - contribute to effective partnership working between all those involved with providing services for pupils.
5. There are three main elements to the Safeguarding and Child Protection policy:
  - prevention – a commitment to early help and identification of unmet needs and vulnerabilities and partnerships with agencies to promote the welfare of pupils and keep children safe
  - protection - all staff and volunteers are trained to recognise and respond to abuse, neglect and exploitation, and are expected to be vigilant and act quickly when they suspect a child is suffering, or is likely to suffer, harm (in line with the Safeguarding Partners procedures)
  - support – recognition of the sensitivity and complex nature of safeguarding and child protection, ensuring that pupils, staff and families are supported appropriately

## Aims

6. To ensure that all practices of a school contribute towards the safeguarding and promoting of the welfare of all of our young people – pupils' welfare is of paramount importance.
7. To emphasise how safeguarding and promoting of the welfare of all of our young people is the primary responsibility of all staff, volunteers and the advisory board.
8. To detail the procedures to follow to ensure the safe recruitment of staff, advisory board and volunteers to the school.
9. To outline the safe working practices that all staff, and volunteers should undertake when working with young people at a school.
10. To communicate clear procedures for identifying, reporting and recording suspected cases of abuse, extremism and radicalisation.
11. To support the mission, vision and values of the school and its establishments.

## Who is responsible for the policy?

12. The proprietor has overall responsibility for the development and effective operation of this policy. The School has delegated day-to-day responsibility for operating the policy to the DSL and the Headteacher.
13. The senior leadership team at the school has a specific responsibility to ensure the fair application of this policy and all are responsible for supporting colleagues and ensuring its success.

---

<sup>1</sup> Significant harm can be defined as 'the ill-treatment or impairment of health and development of a child or young person' where:

- development includes physical, intellectual, emotional, social or behavioural development
- health includes physical and mental health
- ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

14. This policy must be implemented alongside the procedural guidance set out by the local authority.

## School approach

15. The school should facilitate a whole-school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, governing bodies and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback.

## Terminology

16. **Abuse** is Abuse is a violation of a person's human and civil rights that can cause significant harm. It can be defined as any behavior that puts someone at risk of harm or impacts their health and wellbeing. Abuse can take many forms, including:
  - Physical abuse, such as hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating
  - Sexual abuse
  - Financial abuse
  - Emotional abuse
  - Psychological abuse
  - "Honour" based violence
  - Self-neglect
  - Self-harm
  - Suicide
  - Witnessing abuse to others

Abuse can be a single act or repeated acts, and it can occur in many places, including someone's home, a care home, a hospital, or a public place. The signs of abuse aren't always obvious, and the victim may not tell anyone what is happening to them. Abuse can be carried out by anyone, but it's more likely to be carried out by someone the person being abused knows, especially if they trust them. It can also include witnessing ill treatment of others, which can be harmful to children.

17. **Allegation** is where it is alleged that a person who works with children has behaved in a way that has harmed a child, or may have harmed a child, possibly committed a criminal offence against or related to a child or, behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
18. **Child** and **children** refer to children and young people under the age of 18 years. However, the principles of the document apply to professional behaviours towards all pupils, including those over the age of 18 years. 'Child' should therefore be read to mean any pupil at the education establishment.
19. **Child In Need (CIN)** refers to a child who is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a local authority (Children Act 1989).
20. **Children Missing Education (CME)**, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation. It is important that the school's response to children missing education supports the identification of such abuse and also helps prevent the risk of them going missing in future. This includes when problems first emerge but also where children are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:
  - schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points can be found in the department's statutory guidance: Children missing education (DfE 2016)
  - further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#)
  - general information and advice for schools and colleges can be found in the government's Missing Children and Adults strategy (Home Office, 2011).
21. **Child protection (CP)** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm (Children Act 1989).
22. **Child sexual exploitation (CSE) and child criminal exploitation (CCE)** are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement as to gain compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. (Keeping children safe in education, DfE, 2021).

23. **Contextual Safeguarding** recognises that as young people grow and develop they are influenced by a whole range of environments and people outside of their family. For example, in school or college, in the local community, in their peer groups or online. Children and young people may encounter risk in any of these environments. Contextual safeguarding looks at how we can best understand these risks, engage with children and young people and help to keep them safe.
24. **Early Help:** Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:
- is disabled and has specific additional needs
  - has special educational needs (whether or not they have a statutory education, health and care plan)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
  - is showing signs of harmful sexual behaviours
  - is frequently missing/goes missing from care or from home
  - is at risk of modern slavery, trafficking, sexual or criminal exploitation
  - is at risk of being radicalised or exploited
  - has a family member in prison, or is affected by parental offending
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing drugs or alcohol themselves
  - has returned home to their family from care
  - is at risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage
  - is a privately fostered child
- is persistently absent from education (Keeping children safe in education, DfE, 2022)
25. **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
- negate or destroy the fundamental rights and freedoms of others; or
  - undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - intentionally create a permissive environment for others to achieve the results in (1) or (2).

The types of behaviour below are indicative of the kind of promotion or advancement which may be relevant to the definition, and are an important guide to its application. The further context below is also an essential part of the definition. (Gov.co.uk March 2024)

26. **Female Genital Mutilation (FGM)** is a procedure involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse (Keeping children safe in education, DfE, 2024).
27. **Gender Questioning** is a term used to describe someone who is exploring their gender identity and is unsure of what it is or what label best fits them. It's a process of exploration that can include:
- Feeling like something is "off" about your gender identity
  - Feeling distant from the gender you were assigned at birth
  - Wondering what trans means

- Not knowing what label fits best, or if one fits at all

Gender questioning is different from questioning your sexuality. It's also a healthy developmental process that's not the same as confusion.

Some people who are questioning their gender identity may identify as gender neutral, genderqueer, non-binary, or agender.

28. **Ideology** is defined as a set of beliefs (Prevent Strategy, Home Office, 2011).
29. Mental health problems can affect many of our young people. These include depression, anxiety and conduct disorder and self-harm and often have a direct response to what is happening in their lives. Such problems also be indicators that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a concern about a child's mental health that is also a safeguarding concern., then immediate action should be taken.
30. **Non-violent extremism** is extremism, as defined above, which is not accompanied by violence (Prevent duty guidance, Home Office, 2015, updated 2021).
31. **Parent** refers to birth parents and other adults who have legal responsibility for the child, for example stepparents, foster carers and adoptive parents or legal guardian(s).
32. **Child on child abuse** occurs when children abuse other children. As outlined in KCSIE part 5, this is most likely to include, but may not be limited to:
  - bullying (including cyberbullying)
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence, such as rape, assault by penetration and sexual assault
  - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
  - upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - (also known as youth produced sexual imagery)
  - initiation/hazing type violence and rituals
33. **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism (Keeping children safe in education, DfE, 2021).
34. **Safeguarding and promoting the welfare of children** is providing help and support to meet the needs of children as soon as problems emerge protecting children from maltreatment, whether that is within or outside the home, including online preventing the impairment of children's mental and physical health or development ensuring that children grow up in circumstances consistent with the provision of safe and effective care taking action to enable all children to have the best outcomes. (Working together to safeguard children 2023)
35. **Staff and adults** refer to all those who work with pupils in an educational establishment, in either a paid or unpaid capacity. This would also include, for example, those who are not directly employed by the school or setting, e.g. local authority staff, sports coaches, advisory board members and the proprietor.
36. **Terrorism** is defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system according to the Terrorism Act 2000 (TACT 2000). 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 Proprietors commitment**

37. Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating.
38. The proprietor is committed to providing safe, caring and welcoming environments where every child is able to reach their full potential free from harm, abuse and discrimination. All staff and volunteers are expected to discharge their safeguarding responsibilities effectively and recognise that high self-esteem, confidence, peer support and clear lines of communication with trusted adults helps all children, especially those at risk of or suffering abuse, to thrive.
39. Schools are alert to the signs of abuse, neglect and radicalisation and follow procedures to ensure that children receive effective support, protection and justice.
40. Schools will work with social care, the police, health services and other services (such as channel co-ordinators/police practitioners where appropriate) to promote the welfare of children and protect them from harm.

## **Role of Tower Learning Centre Independent School**

41. The school has responsibility for development and review of the Safeguarding and Child Protection policy and for ensuring compliance with the relevant statutory framework. The policy is designed to ensure that effective systems and procedures are in place to safeguard and promote the welfare of young people.
42. The proprietor will support the head to ensure the effective implementation of the Safeguarding and Child Protection policy.

## **Role of the Head teacher**

43. The head teacher is expected to:
  - ensure that the Safeguarding and Child Protection policy and procedures are implemented and followed by all staff
  - ensure the Designated Safeguarding Lead(s) (as set out in their job description Appendix 1) is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children
  - identify a designated teacher with responsibilities for promoting the educational achievement of looked after children (LAC) who is expected to undertake appropriate training. Their responsibilities will be set out in their job description (Appendix 2)
  - ensure all staff receive induction training, regular updates on child protection issues and annual safeguarding training on child protection issues
  - appoint an investigating officer to be the case manager who will liaise with the local authority designated officer (LADO) in the event of allegations of abuse being made against a member of staff or volunteer
  - ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures
  - ensure that pupils' safety and welfare is addressed through the curriculum

- ensure appropriate arrangements are in place to ensure staff fulfil their statutory duty to report to the police any discovery that Female Genital Mutilation appears to have been carried out on a girl under 18
- ensure the school has arrangements in place to fulfil its duty to have 'due regard to the need to prevent people from being drawn into terrorism'
- ensure the school has arrangements in place to monitor and respond to children who go missing from education
- where applicable, ensure the school fulfils its responsibility to complete the Section 157/175 Audit in liaison with the Safeguarding Partners
- ensure the school fulfils its responsibility to complete a Prevent risk assessment

## **Role of the designated safeguarding lead(s)**

44. The designated safeguarding lead should be a member of the senior leadership team and their responsibilities will be set out in their job description (Appendix 1).
45. All safeguarding concerns, suspicions and disclosures are reported to the school's designated safeguarding lead for safeguarding and child protection.
46. The designated safeguarding lead will:
  - have a working knowledge of how the local authority conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
  - ensure each member of staff has access to and understands the Safeguarding and Child Protection policy and procedures and has read at least Part 1 of Keeping children safe in education (DfE, 2021)
  - ensure all staff receive induction training, regular updates on child protection issues and annual safeguarding training on child protection issues
  - be alert to the specific requirements of children in need, those with special educational needs and or disabilities, young carers and any other susceptible groups
  - keep detailed, accurate, secure records of concerns and referrals
  - encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them
  - complete an annual review of the Safeguarding and Child Protection policy and procedures
  - ensure the Safeguarding and Child Protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
  - where applicable, complete the local authority 157/175 Audit
  - complete an annual Prevent risk assessment
  - link with appropriate outside agencies to ensure staff receive training on the Prevent agenda, and the means by which to identify extremism and prevent radicalisation and what to do to support them
  - understand the Channel Panel referral system
  - ensure the school Single Central Record is regularly reviewed
  - keep a record of staff attendance at safeguarding and child protection training
  - consider whether it is appropriate to share any information with the new school or college in advance of a pupil leaving, in addition to the child protection file. Keeping children safe in education (DfE 2021), gives the example of information that would allow the new school or college to continue supporting a victim of abuse and have the appropriate support in place for the pupil's arrival

- where children leave the school, ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt is obtained
  - understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
  - take the lead with early help support where appropriate (Keeping children safe in education, DfE, 2021)
  - ensure school staff are aware of their statutory duty to report to the police any discovery that female genital mutilation appears to have been carried out on a girl under 18
  - where applicable, ensure that the school has suitably trained key adults in order to fulfil its obligations under Operation Encompass
  - where applicable, ensure that the school's commitment to Operation Encompass is known throughout the school community via the means of staff training, parental letters, posters and the school website
47. In managing referrals, the designated safeguarding lead will:
- refer all cases of suspected abuse to the local authority children's social care team and:
    - the local authority designated officer (LADO) for child protection concerns for all cases which concern a staff member
    - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child)
  - use the NPCC guidance for when to call the police
  - liaise with the principal to inform them of issues, especially on-going enquiries under section 47 of the Children Act 1989 and police investigations
  - act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
48. At least one deputy designated safeguarding lead will be identified in school and trained to the same standard as the designated safeguarding lead. The designated safeguarding lead will, however, take lead responsibility.
49. During term time, the designated safeguarding lead and/or deputy designated safeguarding lead will always be available (during school hours) for staff to discuss safeguarding concerns. Appropriate cover will also be put in place to cover out of hours/out of term time activities.

## **Role of staff**

50. All staff have a responsibility to provide and maintain a safe environment in which to learn.
51. All staff have a responsibility to identify children who may benefit from early help, who are suffering, or are likely to suffer, significant harm or who express extremist ideologies and are thus susceptible to radicalisation and to take appropriate action, working with other services as needed.
52. All staff are expected to:
- read at least part one of the DfE guidance document 'Keeping children safe in education' 2021
  - be aware of systems within the school which support safeguarding (e.g. Safeguarding and Child Protection policy, Staff Code of Conduct, identity and role of the designated safeguarding lead) and how to report safeguarding concerns
  - be aware of the early help process and understand their role in it, including liaising

with the designated safeguarding lead, sharing information and in some cases acting as the lead professional. The following indicators help staff recognise the potential need for early help:

- the child is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- the child is at risk of modern slavery, trafficking or exploitation
- the child is showing early signs of abuse and/or neglect
- the child is at risk of being radicalised or exploited
- the child is a privately fostered child
- the child has experienced multiple suspensions and is at risk of permanent exclusion from school
- be aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments
- be familiar with, and implement, safe working practices outlined in this policy (Appendix 3) and other school procedures
- be familiar with and alert to the key indicators of abuse, neglect and vulnerability to radicalisation
- ensure that they take all reasonable steps to minimise the risk of harm to young people at the school and home
- ensure they take all reasonable steps to challenge extremist ideologies
- contribute to a supportive culture where young people are able to report concerns
- involve the appropriate member(s) of staff when a child informs them that he/she is being abused (Keeping children safe in education, DfE, 2021)
- report any abuse, suspected abuse or concerns regarding extremism/radicalisation to the designated safeguarding lead(s) immediately and, where required, support social workers to take decisions about individual children
- report any concerns regarding the behaviour of an adult working at the school to the principal; and if the concern is regarding the principal, then report this to the local LADO
- undertake annual safeguarding and child protection and Prevent training
- maintain an attitude of 'it could happen here'
- promote fundamental British values (democracy, the rule of law, individual liberty, freedom of speech, freedom of thought, freedom of association and mutual respect and tolerance of different faiths and beliefs)
- liaise with the designated safeguarding Lead to report to the police any discovery that female genital mutilation appears to have been carried out on a girl under 18
- discuss any concerns with the designated safeguarding lead relating to possible indicators that a child may be susceptible to female genital mutilation
- be aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:
  - bullying (including cyberbullying)
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence, such as rape, assault by penetration and sexual assault
  - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
  - upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to

- obtain sexual gratification, or cause the victim humiliation, distress or alarm
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals
- be clear as to the school's policy and procedures with regards to peer-on-peer abuse (Keeping children safe in education, DfE, 2021)

## Confidentiality

53. All staff are expected to:

- ensure that information they receive about pupils is treated in a discreet and confidential manner
- seek advice from a senior member of staff if they are in any doubt about sharing information they hold or which has been requested of them
- be cautious about passing information to others about a pupil

54. School leaders should ensure that all staff who need to share 'special category personal data' are aware that the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition.

## Role of the Senior Management Team

55. Every child matters' (SLT) will play an important role in safeguarding and promoting the welfare of children in the school. The aim of the SLT is to:

- enhance the school's provision for the safeguarding and promotion of the welfare of pupils
- provide a comprehensive pupil support package that will allow the school to put into place support measures which are fully inclusive and wide ranging
- ensure that pastoral support to pupils is personalised and responsive to need
- ensure that pupils with personalised pastoral needs make good to outstanding academic progress line with their peers in school
- ensure that external support is sought where relevant and appropriate for particular pupils with complex pastoral needs or who are from 'susceptible groups'

56. The SLT will maintain a risk register of susceptible pupils who require sustained pastoral support. Pupils will be assessed against criteria for referral based on the local authority's 'continuum of need and response' and guidance related to extremism and radicalisation as part of the Prevent agenda.

57. The risk register will place all pupils in the school into one of five categories:

- **Category 0** – Pupils who have no discernible pastoral needs or have needs which are met through general provision in the school. *This group will not be addressed by the ECM Group*
- **Category 1 – Universal**  
Pupils who have a discernible pastoral need, but there is a low risk and impact of harm to development. The needs and risks are met through universal services or single specific agency response. *The SLT will briefly discuss provision for each pupil in this category, if practical to do so*
- **Category 2 – Some unmet needs and low risk**  
Pupils who have several or complex discernible needs, but there is a low risk and impact of harm to development. The needs and risks are met through universal services or a targeted service response. *The SLT will discuss, agree and review provision for each pupil in this category*
- **Category 3 – Higher levels of unmet needs and medium risk Children in Need (CIN) s.17 Children Act (1989)**

Pupils who have several or complex discernible needs, and there are higher levels of unmet needs and a medium risk of harm to their development. Problems are sustained and persistent and have not been possible to resolve at the previous levels. The need requires a multi-agency approach and a referral to children's social care for a Statutory Single Assessment. *The SLT will discuss, agree and review provision for each pupil in this category.*

- **Category 4 – Significant unmet needs and high-risk child protection (CP) and looked after children s.47 Children Act (1989)**

Pupils who have significant unmet needs and are most immediately susceptible, where there is a substantial high risk and impact of harm to their development. The need requires urgent child protection and safeguarding response through children's social care. *The SLT will discuss, agree and review provision for each pupil in this category.*

58. Pupils who are named on the attendance, punctuality and behaviour risk register that fall into categories 3 and 4 will also be discussed within in SLT meetings to agree and review interventions.

The SLT will meet half-termly to agree and then review strategies for pupils placed in 3 and 4 and 2 if practical to do so.

## **Safeguarding information for pupils to build resilience, awareness and keep children safe**

59. The school recognises that high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps all pupils, and especially those at risk of, or suffering from, abuse.
60. The school will therefore:
  - establish and maintain an ethos where pupils feel secure and are encouraged to talk, and are listened to
  - ensure that pupils know that there are adults in the school who they can approach if they are worried or are in difficulty
  - ensure pupils are aware of the Safeguarding and Child Protection policy and the designated safeguarding lead(s)
  - provide a broad and balanced curriculum which promotes the spiritual, moral, cultural, mental and physical development of young people
  - include in the curriculum activities and opportunities for PSHE/Citizenship/RHE/RSHE which equip pupils with the skills they need to stay safe from abuse (including recognising and managing risk, resisting pressures, healthy relationships) and which will help them develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills
  - embed opportunities for children and young people to learn right from wrong, mix and share with children and value others' views, know about similarities and differences between themselves and others, and challenge negative attitudes and stereotypes
  - promote community cohesion through partnership work and community service activities
  - ensure it has appropriate online filters and monitoring systems in place
  - develop and deliver a curriculum to safeguard children online, all staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and children are at risk of abuse online as well as in day-to-day life which will In many cases take place concurrently via online channels and in daily life
  - implement systems to ensure children are safe from terrorist and extremist material when accessing the internet in school, including establishing appropriate levels of

filtering

- embed the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs in the school curriculum and all activities in and out of school
- ensure that, wherever possible, every effort is made to establish effective working relationships with parents and colleagues from other agencies
- make arrangements for consulting with and listening to pupils through the pupil council, displays and suggestion boxes to ensure children and young people have safe spaces to discuss sensitive topics including terrorism and extremist ideologies.
- Offer SENCO intervention for any pupil that requires additional support.

## **Safeguarding information for parents**

61. The school will ensure the Safeguarding and Child Protection policy is available publicly via the school website and parents are aware of the fact that referrals about suspected abuse or neglect and vulnerability to radicalisation may be made and the role of the school in this.
62. Parents/Carers will be expected to support the school's ethos and the Safeguarding and Child Protection policy by demonstrating mutual respect and tolerance for all, promoting fundamental British values and rejecting all forms of discrimination and extremism.
63. Parents/Carers will receive annual communication in regards to reinforcing the importance of children being safe online as well as an understanding of what filtering systems are in place and what their children will be doing online, including sites pupils will access.

## **Emergency contacts for children**

64. Wherever possible, the school will hold more than one emergency contact number for their pupils. This goes beyond the legal minimum and is good practice to give the school additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern (Keeping children safe in education, DfE, 2021).

## **Safer recruitment**

65. Tower Learning Centre Independent School will adhere to the guidance set out in Keeping children safe in education part 3, which states that "It is vital that schools and colleges create a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children."
66. The school has a robust process and policy for recruitment and selection which highlights its commitment to safer recruitment and the Childcare (Disqualification) Regulations 2009 and Childcare Act 2006.
67. To ensure the single central record (SCR) is accurate, up to date and regularly reviewed.
68. As part of our safer recruitment, all new staff will have online checks prior to their start date. Any shortlisted candidates will be informed of any online due diligence checks.

## **Support for those involved in a child protection issue**

69. The school will support pupils, their families, and staff by:
- taking all suspicions and disclosures seriously
  - nominating a link person (designated safeguarding lead) who will keep all parties informed and be the central point of contact
  - nominating separate link people for the child and member of staff, where a member of staff is the subject of an allegation made by a pupil, to avoid any conflict of interest
  - responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety
  - maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
  - storing records securely
  - offering details of helplines, counselling or other avenues of external support
  - following the procedures laid down in the school's whistleblowing, complaints and disciplinary procedures
  - cooperating fully with relevant statutory agencies
  - making sure a neutral interpreter is available when English is not the child's first language
70. The school recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. This school may be the only stable, secure and predictable element in the lives of children at risk. Whilst at school, their behaviour may still be challenging and defiant and there may even be moves to consider suspension or exclusion from school.
71. The school will endeavour to support pupils through:
- the curriculum, to encourage self-esteem and self-motivation
  - the school ethos, which promotes a positive, supportive and secure environment and which gives all pupils and adults a sense of being respected and valued
  - the implementation of behaviour management policies
  - a consistent approach, which recognises and separates the cause of behaviour from that which the child displays. This is vital to ensure that all children are supported within the school setting
  - regular liaison with other professionals and agencies who support the pupils and their families, in-line with appropriate confidentiality parameters
  - a commitment to develop productive, supportive relationships with parents, whenever possible and so long as it is in the child's best interests to do so
  - the development and support of a responsive and knowledgeable staff group trained to respond appropriately in child protection situations

## **External speakers and charities**

72. As outlined in the schools External Speakers and Charities policy, external speakers and charities will be vetted to ensure pupils are not exposed to inappropriate political or controversial messages and charitable activity is free from harm and consistent with the values of the school.
73. All external speakers/ guests will be monitored by staff at all times and appropriate procedures carried out regarding signing in and identification checking.

## **Use of mobile phones and cameras**

74. The following should be read alongside the schools mobile phone policy
75. Children have their photographs taken to provide evidence of their achievements for

developmental records (The Early Years Foundation Stage, EYFS 2014). Schools are not required to capture consent for this, as the lawful basis for taking photographs in order to provide evidence of achievements for developmental records would be classed as a public task under the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

76. In line with the Data Protection Act 2018, and the UK GDPR, for certain types of processing schools must seek parental consent to take photographs and use video recorders.
77. On admission, parents will be asked to sign their consent for photographs/video recordings to be taken in school and used for the purposes of promoting the school, and internal documents (e.g. staff newsletters), on school intranet sites, school websites, social media sites and in media articles. Parental consent is sought until the age of 13 when, in line with guidance regarding data protection, the consent of the child is sought. Consent will be valid for the full academic life of the child, unless the child's circumstances change in any way (e.g. parental responsibility is amended). If the child's circumstances change additional

consent forms will need to be completed. Photographs and video recordings can be used in accordance with the consent gained for a period of four years after the photograph/video was taken/recorded. This does not cover any other organisation and if any other organisation requests to take photographs of any child, then separate consent before photographs are taken will be sought.

78. For any looked after children (LAC) or children who are adopted the designated safeguarding lead will liaise with the child's social worker, carer or adoptive parents to establish whether consent should be sought. Consideration will be given as to whether the identification of a LAC pupil, or children who are adopted, would risk their security in any way.
79. Consideration will be given to any children for whom child protection concerns have been raised. Should the designated safeguarding lead believe that taking photographs or videos of any children would put their security at further risk, greater care will be taken towards protecting their identity.
80. Measures that can be agreed by the Designated Safeguarding Lead regarding LAC, children who are adopted, or children for whom child protection concerns are as follows:
- photographs and videos can be taken as per usual procedures
  - photographs and videos can be taken for educational purposes and official school use, e.g. on SIMS, but cannot be published online or in external media
  - no photographs and videos can be taken at any time or for any purpose
81. Staff and volunteers are not permitted to use their own mobile phones or cameras to take or record images of children. Pupils are not permitted to use their own mobile phones or cameras to take or record any images of children during session times.
82. The school's digital camera(s) or memory cards must not leave the school setting unless on an official school trip. Photographs will be printed/uploaded in the setting by staff and once done images will be immediately removed from the camera's memory. It is acknowledged that often photographs may contain other children in the background.
83. It is acknowledged that often photographs/video recordings may contain other children in the background, however, guidance should be sought from the Designated Safeguarding Lead regarding those photographs/video recordings that contain LAC, children who are adopted and children for whom there are child protection concerns in the background.
84. Cameras and mobile phones are prohibited in all toilet areas.

## Using ICT

85. In using ICT in lessons, schools must ensure:
- security software is installed on all PCs, laptops and the network to filter inappropriate internet sites
  - security software prevents access to social networking sites
  - anti-viral software is installed on all PCs, laptops and the network and renewed as required
  - the use of the internet is monitored using security software to ensure effective safeguarding within and beyond the school
  - all network access points are placed in a safe, adequately monitored area to prevent unauthorised access and physical tampering
  - all wireless access points are secured using administrative passwords
86. In using ICT (laptops and PCs), all staff are expected to report indecent images found on a computer to a senior leader as soon as possible.
87. Roles and responsibilities to manage filtering and monitoring systems clearly assigned to appropriate staff, with it being the role of the Proprietor to review and discuss with all staff what needs to be done in regards to filtering and monitoring.
88. A review of the filtering and monitoring provision will occur at least annually.
89. Any harmful and inappropriate content will be blocked without unreasonably impacting teaching and learning.

## **Induction**

90. All new members of staff will undergo an induction that includes familiarisation with the school's Safeguarding and Child Protection policy and identification of their child protection training needs.
91. The school's Induction policy outlines the procedures for the induction of new staff.
92. New staff will be inducted fully so that they are able to contribute towards safeguarding and promoting the welfare of pupils.
93. Induction includes ensuring new staff are:
- aware of school systems and structures for supporting the wellbeing of pupils (including online safety)
  - provided with adequate training on safeguarding issues and policy including Safeguarding and Child Protection policy, Staff Code of Conduct, Behaviour policy, Social Media policy and the school's safeguarding response for children who go missing in education (Keeping children safe in education, DfE, 2021)
  - introduced to the designated safeguarding leads
  - made aware of the early help process
  - made aware of the process for reporting concerns
94. All staff will sign to confirm they have received these documents and will adhere to the protocols set out.

## **Training**

95. Designated safeguarding leads will be expected to refresh their DSL training every two years. This will focus on identifying abuse, local reporting arrangements and disseminating training to school staff.
96. All staff will participate in training on safeguarding on a regular basis and the school will

ensure staff are aware of any safeguarding and child protection updates. The school will provide training to all existing staff at least once a year and all new staff during their induction (as outlined in the previous section). This training will focus on identifying and reporting abuse, neglect and exploitation and safe working practices. Staff will be advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. All staff required to read at least part one of the Keeping Children safe in Education document annually and undertake quiz to show understanding.

97. Awareness of Prevent should include:

- an awareness and understanding of the Prevent agenda and their role within it
- the ability to use existing expertise and professional judgement to recognise potentially susceptible individuals who may be susceptible to messages of violence and radicalisation
- the confidence to use a common sense-based response
- the designated safeguarding lead will also be encouraged to undertake the Channel general awareness online training module as a supplementary source of support, along with other staff members.

98. As part of the safeguarding training, staff and volunteers will be given a copy of the Safeguarding and Child Protection policy, Staff Code of Conduct, Social Media policy, Behaviour policy and the school's safeguarding response for children who go missing in education (Keeping children safe in education, DfE, 2024). All staff will sign to confirm they have received these documents and will and will adhere to the protocols set out (Appendix 5)

99. Supply staff and other visitors will be given the school's visitor guide, which outlines core safeguarding measures.

100. The proprietor should also have regard to the Teachers' Standards, which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils, including those with mental health needs.

101. Appropriate members of staff will undertake safer recruitment training. This will enable them to participate in the recruitment of staff.

## **Monitoring safeguarding arrangements**

102. At the start of every academic year, the head and DSL will scrutinise their safeguarding practice by completing a self-assessment of the safeguarding checklist (Appendix 4).

103. The validation of the checklist will be completed by the school's safeguarding leads in collaboration with the designated safeguarding lead in school.

104. Following the validation of the checklist, a joint action plan will be compiled where required, and regular review dates will be agreed.

105. Safeguarding data will be collected every half term to inform the safeguarding dashboard which will be used as a mechanism of reporting safeguarding strengths and weaknesses to the proprietor.

## **Extended school, off-site arrangements and alternative providers**

106. This policy is also applicable to all pupils undertaking extended service activities. Where extended school activities are provided by and managed by the school, our own Safeguarding and Child Protection policy and procedures apply.

107. If other organisations provide services or activities on our site, the school will check that

they have appropriate procedures in place, including safer recruitment procedures.

108. When pupils attend off-site activities, the school will check that effective safeguarding and child protection arrangements are in place. This includes alternative provision and managed moves.
109. All organisations will be vetted to ensure pupils are not exposed to inappropriate political or controversial messages or activities.
110. Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil. The school should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff (Keeping children safe In education, DfE, 2021).

## **Related school policies**

111. The Safeguarding and Child Protection policy should be read in conjunction with the following policies:

- Anti-Bullying policy
- Attendance and Punctuality policy
- Behaviour policy
- Complaints policy
- Data Protection policy
- Disciplinary policy
- Equal Opportunities policy
- External Speakers and Charities policy
- First Aid
- Gender Questioning policy
- Gifts and Hospitality policy
- Health and Safety policy
- ICT Acceptable Use policy
- Off Site Visits policy
- Photography and Video Recording SOP
- Positive Handling policy
- Powers of Search policy
- Personal, Social and Health Education policy
- Pupil Emotional Health and Wellbeing policy
- Recruitment policy
- Relationship, Sex and Health Education policy
- Social Media policy
- Staff Code of Conduct policy
- Whistleblowing policy

## **Concerns about safeguarding practices**

112. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime.
113. Where staff or volunteers wish to raise concerns, they should be raised with the school's management team under the Whistleblowing policy.
114. Where a staff member feels unable to raise the issue with the school or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

115. The NSPCC also provide an alternative route for reporting concerns, staff can email [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or call their helpline **0800 028 0285**.

## Complaints

116. The school's complaints procedure will be followed where a pupil or parent raises a concern about poor safeguarding practices. .

## Recognising abuse

117. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. A child may be abused in a family or institutional setting or community setting by those known to them, or more rarely by others. They may be abused by an adult or adults or another child or children.

118. Abuse can take many forms. Abuse, safeguarding issues and neglect are rarely standalone events that can be covered by one definition or label. Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. If a staff member is unsure, they must always speak to the designated safeguarding lead.

### Physical abuse

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

- any injuries not consistent with the explanation given for them
- injuries which occur to the body in places which are not normally exposed to falls or rough games
- injuries which have not received medical attention
- reluctance to change for, or participate in, games or swimming
- bruises, bites, burns and fractures, for example, which do not have an accidental explanation
- inconsistent accounts for the cause of injuries

### Emotional abuse

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

- depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy

- obsessions or phobias
- sudden underachievement or lack of concentration
- seeking adult attention and not mixing well with other children
- sleep or speech disorders
- negative statements about self
- highly aggressive or cruel to others
- extreme shyness or passivity
- running away
- stealing
- lying

### **Sexual abuse**

121. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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. Possible signs of sexual abuse include:

- the child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age
- sexual activity through words, play or drawing
- repeated urinary infections or unexplained stomach pains
- the child is sexually provocative or seductive with adults
- inappropriate bed-sharing arrangements at home
- severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations
- eating disorders such as anorexia or bulimia

### **Neglect**

122. Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Recognising extremism and radicalisation**

123. The school has a duty to recognise extremism and radicalization and to respond to such behaviour/beliefs or acts.

124. All staff will be appropriately trained and will know to report any concerns to the DSL/Head teacher. Any immediate concerns for serious harm or risk of radicalization should be reported straight to the police.

125. Extremist views should be questioned by staff appropriately and a respectful and accepting ethos is promoted throughout school and the curriculum.
126. Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on schools to have “due regard to the need to prevent people from being drawn into terrorism”. ‘Having due regard’ means that schools should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions. Being drawn into terrorism includes not just violent extremism but also

non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

127. The following guidance provides examples of potential indicators for assessing an individual's vulnerability to being drawn in terrorism. The examples are not exhaustive and vulnerability may manifest itself in other ways; there is not simple profile. The guidance is written with regard to the Home Office guidance "Channel: Protecting vulnerable people from being drawn into terrorism" (2015) and "Channel: Vulnerability assessment framework" (2012).

### **Engagement:**

128. Example needs, susceptibilities, motivations and contextual influences that make individuals susceptible to engagement with an extremist group, cause or ideology include:

- feelings of grievance and injustice
- feeling under threat
- a need for identity, meaning and belonging
- a desire for status
- a desire for excitement and adventure
- a need to dominate and control others
- susceptibility to indoctrination
- a desire for political or moral change
- opportunistic involvement
- family or friends' involvement in extremism
- being at a transitional time of life
- being influenced or controlled by a group
- relevant mental health issues

129. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists
- changing their style of dress or personal appearance to accord with the group
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
- attempts to recruit others to the group/cause/ideology
- communications with others that suggest identification with a group/cause/ideology

### **Intent to cause harm**

130. Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

- over-identification with a group or ideology
- 'them and us' thinking
- dehumanisation of the enemy
- attitudes that justify offending

- harmful means to an end
- harmful objectives

131. Example indicators that an individual has an intention to use violence or other illegal means include:

- clearly identifying another group as threatening by what they stand for and blaming that group for all social or political ills
- using insulting or derogatory names or labels for another group
- speaking about the imminence of harm from the other group and the importance of action now
- expressing attitudes that justify offending on behalf of the group, cause or ideology
- condoning or supporting violence or harm towards others
- plotting or conspiring with others

### **Capability to cause harm**

132. Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public. Example indicators that an individual is capable of directly or indirectly causing harm include:

- having a history of violence
- being criminally versatile and using criminal networks to support extremist goals
- having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
- having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills)

## **Guidance on specific types of abuse**

### **Child sexual exploitation**

133. Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (DfE, 2017).

134. Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

135. Possible signs of child exploitation include:

- acquisition of money, clothes, mobile phones etc without plausible explanation
- gang-association and/or isolation from peers/social networks
- exclusion or unexplained absences from school
- leaving home/care without explanation and persistently going missing or returning late
- excessive receipt of texts/phone calls
- returning home under the influence of drugs/alcohol

- inappropriate sexualised behaviour for age/sexually transmitted infections
- evidence of/suspicions of physical or sexual assault
- relationships with controlling or significantly older individuals or groups
- multiple callers (unknown adults or peers)
- frequenting areas known for sex work
- concerning use of internet or other social media
- increasing secretiveness around behaviours
- self-harm or significant changes in emotional well-being

136. All responses will pay regard to the DfE advice 'Child sexual exploitation - Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation'.

## **Female genital mutilation**

137. Female genital mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

138. The school is alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

139. Signs FGM may be imminent include:

- the possibility that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin
- a professional may hear reference to FGM in conversation, for example a girl may tell other children about it
- a girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'
- a girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk
- parents seeking to withdraw their children from learning about FGM

140. There are a number of indications that a girl or woman has already been subjected to FGM:

- a girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable
- a girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating
- a girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems
- a girl or woman may have frequent urinary, menstrual or stomach problems
- there may be prolonged or repeated absences from school or college
- a prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- a girl or woman may be particularly reluctant to undergo normal medical examinations
- a girl or woman may confide in a professional
- a girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear
- a girl may talk about pain or discomfort between her legs

141. Where staff have a concern, the school will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and children's social care.

142. In line with Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), the school and its staff will fulfil the statutory duty to report to the Police where they discover (either through disclosure by the victim or visual evidence), that FGM appears to have been carried out on a girl under 18.

## **Forced marriage**

143. Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. However, forced marriage is still a crime up to the 18<sup>th</sup> birthday of a child even if no violence or threats are used.

144. All school staff need to be aware when reporting forced marriage that it is dealt with promptly. If the perpetrator becomes aware that the forced marriage is being investigated this can place the child at risk of being sent abroad immediately, disappearing and even murdered. Upon discovering and reporting a forced marriage, school staff should not liaise with the child's family, unless this has been agreed following the risk assessment from police/children's social care. When reporting, the school staff must report any siblings they are aware of within the household too, this includes males as siblings may also be at potential risk.

145. Possible indicators that a pupil may be at risk of forced marriage include:

- a child may appear anxious, depressed and emotionally withdrawn with low self-esteem
- a child may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia
- sometimes a child may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol
- a child may present with a sudden decline in their performance, behaviour, engagement, aspirations or motivation
- a child may discuss an upcoming family holiday that they are worried about
- the child may have fears that they will be taken out of education and kept abroad
- a decline in punctuality which may be the result of having to 'negotiate' their way out of the house
- a child may be withdrawn from school by those with parental responsibility, and not provided with suitable education at home
- a child running away from home
- no time allowed for extra-curricular activities
- surveillance of the child by siblings or cousins
- family history of older siblings leaving education early and marrying early
- the child or other siblings within the family reported as missing
- reports of disc, harassment or breaches of the peace at the family home
- reports by the child of rape or kidnap
- reports by the child of threats to kill and attempts to kill or harm by the perpetrator

## **Child on Child abuse**

146. Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However,

there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

147. Child on Child abuse can include: bullying, sexual bullying at school; being coerced to send sexual images; physical and sexual assaults and violence; child sexual exploitation and teenage relationship abuse. Gang-affected young women are particularly susceptible to being sexually exploited for protection, status, drugs or money.
148. The school takes child on child abuse seriously and all staff are clear that child on child abuse should not be passed off as 'part of growing up' or 'banter'.
149. The school has put in place safeguards to reduce the likelihood of peer-on-peer allegations as outlined in this document and is alert to the indicators of abuse.
150. Incidents of child on child abuse will be dealt in line with the normal school safeguarding procedures.
151. The school understands the importance of Early Help in situations involving child on child abuse and how they can support children of all ages and tries to improve a family's resilience and outcomes or reduces the chance of a problem getting worse.
152. In dealing with child on child abuse, the school recognises:
  - that child on child abuse often occurs in the same school or neighbourhood, thus it is important any response takes account of how a network of peer relationships is affected
  - the relationship between sexual exploitation, serious youth violence, and teenage relationship abuse, and the need to ensure it is recognised when young people are experiencing multiple forms of abuse
  - that young people who have experienced abuse and exploitation can also be groomed to abuse their peers, requiring a much more holistic approach to safeguarding
  - that different gender issues can be prevalent
  - that child on child abuse can be influenced by the nature of the environments in which young people spend their time (e.g. exposure to violence on the streets, exposure to harmful social norms related to gender, relationships and consent)
  - that peer-on-peer abuse hinges upon young people's experiences of power, and ultimately the notion of consent (while young people who abuse their peers have power over the young person they are harming, they may be simultaneously powerless in relation to some peers who are encouraging their behaviour or in the home where they are being abused)
153. The school also recognises that an alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Any decision on action in respect of the alleged perpetrator must be based on the risk they pose to other children and what can be done to minimise this risk. Assessment of an alleged perpetrator's needs will include consideration of:
  - the nature, extent and context of the abusive behaviours
  - the young person's development and family and social circumstances
  - whether the young person appears to pose a continuing risk and, if so
    - who is likely to be at risk from him/her, and the nature and degree of the risk
    - the young person's need for services, both those which relate to his/her harmful behaviour and other significant needs
    - whether the young person is also at risk of significant harm and should be the subject of a child protection conference
    - whether action is to be taken within the criminal justice system

## **Child on child abuse: sharing nudes and semi nudes**

154. The UK Council for Child Internet Safety in partnership with the NSPCC define the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.
155. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image-sharing incidents.
156. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:
- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
  - children and young people digitally manipulate an image of a young person into an existing nude online
  - images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame
157. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.
158. Nude or semi-nude images, videos or live streams may include more than one child or young person.
159. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex.
160. What to do if an incident comes to a staff members attention:
- report it to the designated safeguarding lead (DSL)
  - never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal
  - if the staff member has already viewed the imagery by accident (e.g. if a young person has showed it to them before they could ask them not to), report this to the DSL (or equivalent) and seek support
  - do not delete the imagery or ask the young person to delete it
  - do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent)
  - do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers
  - do not say or do anything to blame or shame any young people involved
  - do explain to them that it will need to be reported and reassure them that they will receive support and help from the DSL (or equivalent)
161. Schools should refer to the guidance 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' when dealing with such incidents.

162. Any disclosures, will be dealt with in line with procedures set out in this policy and subsequent referrals will be made in a timely manner.

163. In line with the school's general safeguarding procedures, all decisions and actions, including dates and times and reasoning will be logged.

### **Child on Child abuse: sexual violence and sexual harassment between children in schools and colleges**

164. 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.

165. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, pupils and school staff are supported and protected as appropriate.

166. Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or 'boys being boys'
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours has the potential to normalise them

167. It is important to understand that all of the above can be driven by wider societal factors beyond the school, such as everyday sexist stereotypes and everyday sexist language.

168. 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. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed.

169. Children reminded told when disclosing abuse, that the law is there to protect them not criminalise.

170. Staff should understand intra-familial harms associated with the disclosure and provide support where possible/appropriate for example for siblings.

171. As with all safeguarding concerns, it is important that in such instances staff take appropriate action in accordance with the Safeguarding and Child Protection policy. Staff should not assume that someone else is responding to any incident or concern. If in any doubt, staff should speak to the Designated Safeguarding Lead (or a deputy). In such cases, the basic safeguarding principles remain the same, but it is important for the school to understand why the victim has chosen not to make a report themselves. This discussion should be handled sensitively and with the support of children's social care if required.

172. There may be reports where the alleged sexual violence or sexual harassment

involves pupils from the same school but is alleged to have taken place away from the school premises, or online. There may also be reports where the children concerned attend two or more different schools. The safeguarding principles, and individual school's duties to safeguard and promote the welfare

of pupils, remain the same. In such circumstances, appropriate information sharing and effective multi-agency working will be especially important (Sexual violence and sexual harassment between children in schools and colleges, DfE, 2021).

## **Faith abuse**

173. Faith abuse is the belief in concepts of witchcraft and spirit possession, demons or the devil acting through children.

174. In working to identify such child abuse it is important to remember every child is different. Some children may display a combination of indicators of abuse whilst others will attempt to conceal them. There are a range of common features across identified cases. These indicators of abuse, which may also be common features in other kinds of abuse, include:

- a child's body showing signs or marks, such as bruises or burns, from physical abuse
- a child becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other children
- a child's personal care deteriorating, for example through a loss of weight, being hungry, turning up to school without food or lunch money, or being unkempt with dirty clothes and even faeces smeared on to them
- evidence that the child's parent or carer does not show concern for or have a close bond with the child
- a child's attendance at school becoming irregular or the child being taken out of school altogether without another school place having been organised, or a deterioration in a child's performance at school
- a child reporting that they are or have been accused of being 'evil' and/or that they are having the 'devil beaten out of them'

175. All staff should be alert to the indicators above and should be able to identify children at risk of this type of abuse and intervene to prevent it.

## **Fabricated illness**

176. Fabricated or induced illness (FII) is a form of child abuse. It occurs when a parent or carer, , exaggerates or deliberately causes symptoms of illness in the child. FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves).

177. FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This ranges from extreme neglect (failing to seek medical care) to induced illness. Behaviours in FII include a parent or carer who:

- persuades healthcare professionals that their child is ill when they are perfectly healthy
- exaggerates or lies about their child's symptoms
- manipulates test results to suggest the presence of illness – for example, by putting glucose in urine samples to suggest the child has diabetes
- deliberately induces symptoms of illness – for example, by poisoning her/his child with unnecessary medication or other substances

## **Child criminal exploitation: serious violence/county lines**

178. Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of serious violence and county lines criminal activity: drug networks or gangs groom and

exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

179. Key to identifying potential involvement in serious violence/county lines are missing episodes in education, a change in friendships or relationships with older individuals or groups, significant decline in performance, signs of self-harm or significant change in wellbeing, signs of assault or unexplained injuries, drug or alcohol misuse, missing for periods of time or regularly home late. Unexplained gifts or new possessions are also indicators of children being involved with individuals associated with criminal networks or gangs.

180. When the victim may have been trafficked for the purpose of transporting drugs, like other forms of abuse and exploitation, county lines exploitation can affect:

- any child or young person (male or female) under the age of 18 years, even if the activity appears consensual. The perpetrators may well be part of a group; single/mixed sex
- any susceptible adult over the age of 18 years

181. Child exploitation is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources (Keeping children safe in education, DfE 2021).

### **So-called 'honour-based' violence**

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

183. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

184. If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care (Keeping children safe in education, DfE, 2021).

### **Homelessness**

185. Being homeless or being at risk of homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of becoming homeless include household debt, rent arrears and domestic abuse, along with the child being withdrawn and maybe showing signs of physical neglect.

### **Domestic Abuse**

186. Domestic abuse can be psychological, physical, sexual, financial or emotional. It can impact children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. Children and young people might also feel frightened and confused, keeping the abuse to themselves.

### Signs that a child has witnessed domestic abuse can include:

- aggression or bullying
- anti-social behaviour, like vandalism
- anxiety, depression or suicidal thoughts
- attention seeking
- constant or regular sickness, like colds, headaches and mouth ulcers
- drug or alcohol use
- eating disorders
- problems in school or trouble learning
- withdrawal.

187. If a child discloses domestic abuse staff should be aware of the following procedure:

If a child talks to you about domestic abuse it's important to:

- listen carefully to what they're saying
- let them know they've done the right thing by telling you
- tell them it's not their fault
- say you'll take them seriously
- don't confront the alleged abuser
- explain what you'll do next
- explain that the process may involve some delicate/personal questions
- report what the child has told you as soon as possible.

### Upskirting

188. Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

189. A 'specified purpose' is namely:

- obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear)
  - to humiliate, distress or alarm the victim
190. 'Operating equipment' includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera.
191. Upskirting will not be tolerated by the school
192. Any incidents of upskirting will be reported to the designated safeguarding lead who will then decide on the next steps to take, which may include police involvement.

## **Online risks**

193. The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school to protect and educate the whole school or community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.
194. Schools should carry out an annual online safety review to ensure the curriculum and supportive interventions reflect the risks associated with the presentation online of the pupil's face.

## **What is online abuse?**

195. Online abuse is any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including:
- social media
  - text messages and messaging apps
  - emails
  - online chats
  - online gaming
  - live-streaming sites
196. Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming. Or the abuse might only happen online.

## **Signs of online abuse**

197. A child or young person experiencing abuse online might:
- spend a lot more or a lot less time than usual online, texting, gaming or using social media
  - seem distant, upset or angry after using the internet or texting
  - be secretive about who they're talking to and what they're doing online or on their mobile phone
  - have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet
198. Some of the signs of online abuse are similar to other abuse types:
- Cyberbullying
  - Grooming
  - Sexual abuse
  - Child sexual exploitation and sexting
  - Harassment/trolling
  - Exclusion
  - Denigration and Impersonation

## **Child abduction and community safety incidents**

199. Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.
200. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.
201. As children get older and are granted more independence, it is important they are given practical advice on how to keep themselves safe. As part of the PSHE curriculum, lessons are provided on outdoor safety.
202. Lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

## **Self-harm**

203. Self-harm is when someone deliberately hurts or injures themselves.
204. It is a continuum ranging from a behaviour which has strong suicidal intent to behaviour which is part of a coping mechanism.
205. It can be used to describe behaviours such as cutting, scratching, burning, taking overdoses, punching oneself, substance abuse, self-poisoning, unsafe sex etc.
206. Common problems preceding self-harm are:
- difficulties with parents/boy or girlfriends/siblings/friends
  - school problems/bullying
  - mental health issues e.g. depression, eating disorders
  - low self esteem
  - sexual problems
  - physical ill health
  - alcohol/drug abuse
  - physical/sexual abuse
207. Possible reasons/motives underlying self-harm are:
- to die
  - to escape from unbearable distress
  - to change the behaviour of others
  - to show desperation to others
  - to get back at other people or make them feel guilty
  - to relieve tension
  - to seek help
208. All staff are expected to:
- listen to pupils who are experiencing emotional distress in a calm and non-judgemental way
  - report the self-harm incident to the DSL as soon as possible.
  - not make promises e.g. assuring confidentiality which cannot be kept. Reassure the pupil that in order to receive help and find more helpful ways to cope with problems others may need to know.
  - guide the pupil towards wanting to make positive changes

- promote problem-solving techniques and non-harmful ways to deal with emotional distress
- provide accurate information about self-harming and awareness about associated mental health problems
- be aware of health and safety issues such as first aid if the incident has occurred in school
- seek medical advice or urgent medical assistance where required (e.g. in the event of an overdose)

209. The designated safeguarding lead will:

- keep accurate records of incidents of self-harm and concerns
- follow up any medical emergencies or referrals
- liaise with local services about help available for young people who self-harm
- keep up-to-date information about self-harm, e.g. info leaflets from YoungMinds
- liaise with the wider safeguarding and pastoral team
- contact the parents at the appropriate time. Involve the pupil in this process. Inform the parent about the appropriate help and support that is available for their child. Monitor the pupil's progress, e.g. school work, general presentation, following the incident
- know when to seek help to deal with their own feelings and distress

210. Pupils will be expected to

- talk to the appropriate staff member if they are in emotional distress
- alert a teacher if they suspect a fellow pupil of being suicidal or at serious risk of harm to themselves, and know when confidentiality must be broken

211. Parents will be encouraged to:

- endorse the schools approach to dealing with self-harm and education/awareness raising
- work in partnership with the school
- keep the school informed when a child has external agency support

## **Gender Questioning**

212. When considering gender questioning, this school will follow specific procedures to ensure the wellbeing and safety of our pupils and ensure all staff understand such procedures set out in the Gender Questioning policy 2024. These will include:

- Keep accurate records- School should accurately record a child's sex in their admissions register, as this is important for safeguarding.
- Involving parents- Schools should involve parents in discussions about a child's gender identity, unless there is a risk of harm to the child.
- Considering the child's best interests- Teachers should consider the child's best interests, the wider context, and the impact on the school community.
- Considering pronouns- School should carefully consider requests to change pronouns, consulting parents and evaluating the impact.
- Considering social transition- Social transition should be extremely rare when the appropriate safeguards are in place.

## **Further information of specific safeguarding issues**

213. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. The NSPCC offers information

for schools on its website [www.nspcc.org.uk](http://www.nspcc.org.uk). Broad government guidance on the issues listed below can also be accessed via the [www.gov.uk](http://www.gov.uk) website:

- [Advice to schools and colleges on gangs and youth violence - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Channel and Prevent Multi-Agency Panel \(PMAP\) guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Child abuse linked to faith or belief: national action plan - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Child sexual exploitation: definition and guide for practitioners - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Children Act 1989: private fostering - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Children who run away or go missing from home or care - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Domestic abuse: get help during the coronavirus \(COVID-19\) pandemic - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Drugs: advice for schools - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Educate Against Hate - Prevent Radicalisation & Extremism](http://www.gov.uk)
- [Forced marriage - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- <https://www.ceop.police.uk/safety-centre/>
- [Missing Children and Adults strategy - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- [Multi-agency statutory guidance on female genital mutilation - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

- [Preventing bullying - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Safeguarding children in whom illness is fabricated or induced - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Safeguarding children who may have been trafficked - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [The mental health strategy for England - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [The use of social media for online radicalisation - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- ['This is abuse' campaign - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Violence against women and girls - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

## **Recognising children who may be particularly susceptible**

214. Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

### **Children who are looked after**

215. The most common reason for children becoming looked after is as a result of abuse and/or neglect. The school will ensure that staff have the skills, knowledge and understanding to keep looked after children safe.
216. In particular, the school will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. The school also collates information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
217. A previously looked after child potentially remains susceptible and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly susceptible group.
218. The school will appoint a designated teacher who will work with local authorities to promote the educational achievement of registered pupils who are looked after (the designated safeguarding lead). Under sections 4 to 6 of the Children and Social Work Act 2017, designated teachers also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher must have appropriate training and the relevant qualifications and experience (Keeping children safe in education, DfE 2021).

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

219. Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. These can include:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
  - being more prone to peer group isolation than other children

- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers

220. To address these additional challenges, schools should consider extra pastoral support for children with SEND.

221. When applying disciplinary measures such as restraint or isolation in response to incidents involving children with SEND, schools should consider the risks carefully, given the additional vulnerability of the group. However, to safeguard a pupil and others, it may be necessary to use restraint.

222. By planning positive and proactive behaviour support, schools can reduce the occurrence of risky behaviour and the need to use restraint (Keeping children safe in education, DfE, 2021).

## **LGBTQ+**

223. LGBTQ+ children should be provided with a safe space for them to speak out or share their concerns to a member of staff.

## **Other considerations**

224. In addition to the above, to ensure that all our pupils receive appropriate protection, the school will give special consideration to children who are:

- living in a domestically abusive situation
- affected by parental substance misuse
- asylum seekers
- regularly absent from school
- attending alternative provision or subject to a managed move
- living away from home (frequent movers)
- susceptible to being bullied, or engaging in bullying
- living in temporary accommodation; for example, living in hotel/hostel accommodation
- living a transient lifestyle
- living in chaotic and unsupportive home situations
- susceptible to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- involved directly or indirectly in prostitution or child trafficking
- speakers of another first language
- subject to a child protection plan
- subject to a child in need plan
- susceptible to messages of violence and extreme ideologies
- young carers
- receiving support for their mental health
- part of a family living with financial hardship

## **Contextual Safeguarding**

225. In accordance with the Working together to safeguard children document (2023), Tower Learning Centre Independent School pledges to consider the threats and risks of the welfare of children outside their families. These extra-familiar threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community or online.

226. We understand that these threats can take a variety of different forms and children can be susceptible to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking; online abuse; teenage

relationship abuse; sexual exploitation and the influences of extremism leading to radicalisation. Extremist groups make use of the internet to radicalize, recruit and to promote extremist materials. Any potential harmful effects to individuals identified as susceptible to extremist ideologies or being drawn into terrorism are also be considered.

227. Tower Learning Centre Independent School takes into consideration wider environmental factors in a pupil's life on an individualised basis. We will work with outside agencies including but not exhaustive of; parents/careers, social workers and police to assure the wellbeing of each pupil in regards to contextual safeguarding. We will allow for interventions to be implemented, addressing these wider environmental factors along with a comprehensive curriculum which promotes safety in our community and wider world.
228. Tower Learning Centre Independent school also pledges to work alongside the local community to promote the safety and well-being of our pupils. If any areas are brought the attention of the school, we will work to encourage and promote health and safety as well focus on dealing with any safeguarding issue that arises. The Designated Safeguarding Lead should be informed of any contextual safeguarding issue as well as any Geography of harm, and the usual reporting procedures should apply.
229. Tower Learning Centre Independent School offers a Safety Mapping tool and instructions can be found in Appendix 14.

## **Children who are absent from education for prolonged periods or repeated occasions.**

230. A child going missing from education is a potential indicator of abuse or neglect.
231. The school will ensure its procedures for dealing with children who go missing from education, particularly on repeat occasions, are rigorously implemented to help identify the risk of abuse, neglect and exploitation and to help prevent the risks of their going missing in the future. The **Pupils Who Go Missing During the School Day Standard Operating Procedure** must be used.
232. The school will inform the referring local authority of any pupils who are failing to attend school regularly or going to be deleted from the admission register under all fifteen grounds for deletion. This will be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name

from the register. The school will record details of the pupil's residence, the name of the person with whom they will reside, the date from which they will reside there, and the destination school (where this can reasonably be obtained).

233. The school will carry out home visits when pupils have missed three consecutive days or several days over a short period of time.

234. Plans and reasonable adjustments will be made to ensure the pupil returns to education.

235. Appropriate professionals will be notified of persistent absences by the school. We will work with them and the young person to ensure pupils are safe and return to school.

## **Dealing with safeguarding concerns and incidents<sup>2</sup>**

### **Responding to a disclosure**

236. All staff to understand that children may not feel ready to or know how to tell someone they are being abused.

237. If a child reports that they are being abused and/or neglected, staff should listen to them, take their allegation seriously, and reassure them that action will be taken to keep them safe.

238. It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

239. If a pupil talks to a member of staff about any risks to their safety or wellbeing (including that of mental health or self-harm), the staff member will need to let the pupil know that they must pass the information on – staff are not allowed to keep secrets. The point at which they tell the pupil this, is a matter of professional judgement. If they jump in immediately, the pupil may think that they do not want to listen. If left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

240. During their conversations with the pupils, staff will:

- allow them to speak freely; listening carefully and uncritically
- endeavour to utilise a neutral translator if necessary
- remain calm and collected – the pupil may stop talking if they feel they are upsetting their listener
- give reassuring nods or words of comfort and reassure the pupil that they are right to tell – 'I'm sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- not be afraid of silences – staff must remember how hard this must be for the pupil
- consider their own body language and the messages it may send a child regarding the nature of the disclosure
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think
- tell the pupil that in order to help them, the member of staff must pass the information on

---

<sup>2</sup> Where schools are using an online safeguarding management system, they are required to ensure that all records required in this section are produced using the recording proformas and templates of the system.

- not automatically offer any physical touch as comfort - it may be anything but comfort to a child who has been abused
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next - the pupil may agree to go to see the designated safeguarding lead otherwise it is the duty of the member of staff to inform the designated safeguarding lead of what has been discussed (if the pupil does agree to go and see the designated safeguarding lead, the staff member should inform the designated safeguarding lead that the child will be coming to see them at some point)

241. Following the conversation, the staff will report the disclosure as outlined in the Reporting safeguarding concerns section taking precaution to report to the designated safeguarding lead even if the child has promised to do it by themselves and following up with a written record. Staff should seek support if they feel distressed.

### **Responding to a concern that a child is at risk**

242. There will be occasions when, in the absence of a disclosure, staff may suspect that a pupil may be at risk but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre or concerning, pupils might write stories or poetry that reveal confusion, distress or extreme beliefs, or physical but inconclusive signs may have been noticed. In these circumstances, staff will give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine for staff to ask the pupil how they are feeling or if they can help in any way.

243. Staff should report their concerns as outlined in Reporting safeguarding concerns section.

### **Reporting safeguarding concerns**

244. Reporting procedures will be fully explained to all staff to ensure concerns are reported quickly and records are as concise and unambiguous as possible.

245. All concerns, suspicions and disclosures should be recorded using the school's online safeguarding management system. For supply staff, volunteers or visitors to school, the school's safeguarding concern form (see Appendix 6) should be used to report concerns. Blank copies of the safeguarding concern form should be kept in the main office and staffroom for access when necessary.

246. Staff should immediately report:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- any explanation given which appears inconsistent or suspicious
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. significant changes in behaviour, worrying drawings or play)
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a child is presenting signs or symptoms of abuse or neglect
- any significant changes in a child's presentation, including nonattendance
- any hint or disclosure of abuse or neglect received from the child, or from any other person, including disclosures of abuse or neglect perpetrated by adults outside of the family or by other children or young people

- any concerns related to self-harm
  - any concerns regarding person(s) who may pose a risk to children (e.g. staff in school or a person living in a household with children present) including inappropriate behaviour e.g. inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images
  - any discovery that FGM appears to have taken place on a girl under 18 years
  - any expressions of extremist ideologies that suggest vulnerability to radicalisation
247. Where no disclosure has been made, but a member of staff has concerns regarding the welfare or well-being of a pupil, staff should raise a concern on the online safeguarding management system. Supply staff, volunteers and visitors to the school should make a written account of such concerns using Part 1 of the Safeguarding Concern Form and Part 3 if applicable (Appendix 6).
248. Where a disclosure has been made, a written factual account record, using the child's own words, should be recorded on the safeguarding management system. Supply staff, volunteers and visitors to the school who do not have access to the safeguarding management system should do this by completing Part 1 and Part 2 of the Safeguarding Concern Form (and Part 3 if applicable).
249. When logging a concern, professional opinion may be expressed, but should be supported by stating the facts with observations upon which the opinion is based (e.g. Adam appeared angry as he was kicking the table and swearing). All notes should differentiate clearly between fact, opinion, interpretation, observation, and/or allegation.
250. All written concerns should be logged on the online system as soon as possible and in any case within 24 hours. In the case of supply staff, volunteers and visitors to the school, written forms should be passed to the Designated Safeguarding Lead as soon as is possible, and in any case within 24 hours. In some cases, it may be necessary to pass on concerns verbally and follow them up in writing soon after. In the absence of this person, the deputy designated safeguarding lead should be approached.
251. Any written records should be dated and signed with the name of the signatory clearly printed. Any handwritten notes made immediately after the event can act as evidence of them being written at the time in any future court case. Therefore, these should not be destroyed if the details are recorded more formally, but instead kept securely attached to the safeguarding concern form. All written notes should either be kept in the pupil safeguarding file and referenced on the online database or uploaded on to the system.
252. Staff will follow the reporting procedures outlined in this standard operating procedure. However, anybody can make a direct referral. They may share information directly with children's social care, Police or the NSPCC if:
- the situation is an emergency and the designated safeguarding lead, their deputy, the principal and the chair of governors are all unavailable
  - they are convinced that a direct report is the only way to ensure the pupil's safety
253. Key points for staff to remember for taking action are:
- report the concern to the designated safeguarding lead, before the end of the school day if a child is being placed at risk by going home or within 24 hours at the latest
  - in an emergency, take the action necessary to help and protect the child, for example, call 999
  - not to start their own investigation

- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- record the concern on the online platform
- seek support if distressed

## **Responding to safeguarding concerns**

254. A concern raised may not progress any further than a discussion with the designated safeguarding lead. A record of the discussion and any initial action taken will be documented on the safeguarding management system.
255. When dealing with a case, the designated safeguarding lead will consider a number of questions.
- Am I dealing with 'risk' or 'need'? (by definition, a child at risk is also a child in need. However, what is the priority/level and immediacy of risk/need?)
  - Can the level of need identified be met:
    - in or by the school or by accessing universal services without referral to Children's Social Care or other targeted services?
    - by working with the child, parents and colleagues?
  - What resources are available to me/the school and what are their limitations?
  - Is the level of need such that a referral needs to be made to Children's Social Care which requests that an assessment of need be undertaken?
  - Is the level and/or likelihood of risk such that a child protection referral needs to be made (i.e. a child is suffering or is likely to suffer significant harm?)
  - What information is available to me: child, parents, family and environment?
  - What information is inaccessible and potentially, how significant might this be?
  - Who do I/don't I need to speak to now and what do they need to know?
  - Where can I access appropriate advice and/or support?
  - If I am not going to refer, then what action am I going to take?
256. The designated safeguarding lead will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.
257. In making this decision, the designated safeguarding lead will consider the Safeguarding Partners' threshold document and framework for action that includes:
- the process for the early help assessment and the type and level of early help services to be provided
  - the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services
258. Where a designated safeguarding lead or deputy designated safeguarding lead considers that a referral to children's social care may be required, they must consider the questions listed below.
- Is this a child in need? Under section 17 (s.17 (10)) of the Children Act 1989, a child is 'in need' if:
    - the child is unlikely to achieve or maintain, or to have the opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority
    - the child's health or development is likely to be impaired, or further impaired, without the provision of such services

- the child is disabled
- Is this a child protection matter? Under section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where they are informed that a child who lives or is found in their area:
  - is the subject of an emergency protection order
  - is under police protection
  - or where they have reasonable cause to suspect that a child is suffering or is likely to suffer significant harm

259. Therefore, it is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under s.47 must therefore provide information which clearly outlines that a child is suffering or is likely to suffer significant harm. The designated safeguarding lead will make judgements around 'significant harm', levels of 'need and risk' and when to refer.

260. Once a referral has been made, children's social care should respond within one working day indicating what further action they have decided to take. This may include further assessment of the child either through an early help assessment, through a child in need assessment (section 17 Children Act 1989) or a child protection enquiry (section 47 Children Act 1989). The school will participate in strategy discussions and child protection conferences as required.

261. Referrals regarding extremism will be made to children's social care. In line with government advice, a Channel coordinator/police practitioner will be fully embedded in the safeguarding arrangements of children's social care if required, however an individual will be required to provide consent before any support is delivered via Channel. Where assessment does not indicate a genuine vulnerability to being drawn into terrorism, a case will be signposted to other more appropriate support services following consultation with the LADO.

## **Allegations against members of staff**

262. If anyone makes an allegation that any member of staff (including supply staff, volunteer or governor) may have:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children (including the promotion of extreme ideologies)

263. The allegation will be dealt with in accordance with national guidance and agreements, as implemented by the Safeguarding Partners.

264. The flowchart in Appendix 8 outlines the steps for schools when dealing with an allegation against a member of staff.

265. The principal, rather than the designated safeguarding lead, will handle such allegations as case manager, unless the allegation is against the principal, in which case the appointed appropriate person will act as case manager and handle the school's response.

266. In all instances, the case manager will have no role in the investigation at the onset of the allegation and the principal must discuss the allegation with the local authority designated officer. The full procedures for dealing with allegations against staff can be found in the Safeguarding Partners policy on allegations against staff.

267. The human resources (HR) team will be informed as soon as the school becomes aware of any allegation against a staff member and the investigation process should not commence until advice has been taken.
268. Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know. However, there will be some cases that require a strategy discussion with children's social care and/or the police and it will be within the strategy discussion that decisions are made as to what information can be disclosed to parents or carers.
269. In the event of an allegation being made, the school will make every effort to maintain confidentiality and guard against unwanted publicity. Parents and carers will be made aware that under s141F of the Education Act 2011, there is a prohibition on reporting or publishing allegations about teachers, this includes via social media and if breached this could lead to prosecution. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be advised to seek legal advice.
270. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.
271. Where a risk assessment is required, the HR team will support the school with the completion of Appendix 7.
272. The school HR may make a referral to the Disclosure and Barring Service (DBS) if any member of staff is disciplined, dismissed or leaves prior to the end of an investigation for causing emotional, psychological, physical or sexual harm, neglect or risk of harm to children.
273. If an allegation is made against a worker from a supply agency, the agency must be informed of the allegation. Allegations against supply staff will be investigated in line with the agreed procedure detailed above for directly employed staff. The findings of any investigation undertaken, where appropriate, should be passed on to the supply agency for it to consider any further action required. It is not acceptable to simply end the assignment in such circumstances.

## **Low-Level concerns**

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviours could include but are not limited to:

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

## Dealing with and reporting Low-Level concerns

275. Refer to Tower Learning Centre independent School Low-Level concerns policy for information on how to report and record low-level concerns against staff.

### Record keeping

276. A child protection file will be started for an individual child as soon as the school is aware of any child protection concerns about them (online/paper based). This may arise in a number of ways:

- where a member of staff raises a concern about the welfare or well-being of a pupil (this should be recorded on the safeguarding management system or, in the case of supply staff, volunteers and visitors to the school, in writing using Appendix 6 Part 1 (and 3 if applicable))
- where a child makes a disclosure (this should be recorded on the safeguarding management system or, in the case of supply staff, volunteers and visitors to the school, in writing using Appendix 6 Part 1 and 2 (and 3 if applicable))
- where information is passed to the school by a previous school attended by the pupil
- where the school is alerted by another agency (e.g. police, health or social care) of child protection concerns about that child

277. The child protection file will have a front sheet (see Appendix 9) on the file which records the child's full name, date of birth, address and information about family members.

278. Separate files will be kept for individual siblings, cross referencing to other children in the family. Relevant, and as necessary, redacted information will be copied and placed on each individual sibling's file.
279. If more than one file exists in relation to an individual child, this will be indicated on each file. Each file will be numbered and dated (e.g. January 2015, Vol. 1 of 3).
280. If information is removed from the file for any reason, a record should be made indicating the reason for such removal, where the information has gone, when it was removed and who removed it (see Appendix 10). The designated safeguarding lead will be notified of the removal of any information from a file.
281. The child protection file will contain:
- a front sheet (see Appendix 9)
  - a detailed chronology, updated on a regular basis, at the front of the file (see Appendix 11)
  - any concerns raised by staff
  - all safeguarding/concern reports, notes and correspondence referring to the child
  - copies of any referrals
  - any child protection information received from previous schools or other agencies
  - notes/minutes of any child protection conferences etc.
  - record of any instances where information has been removed from the file
282. The school will record in SIMS whether the child is subject to a child protection plan or if they are a child in care.
283. The child protection file will also cross-reference other relevant records held in school (e.g. relating to the Common Assessment Framework (CAF)/Early Help Assessment (EHA), early support, special educational need).
284. All records of child protection concerns, disclosures or allegations will be treated as sensitive information and kept together. Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. All staff who may need to consult a child's school file will be made aware of what the symbol means, and who to consult if they see this symbol. The information will be shared with those who need to have it.
285. All child protection files will be kept together in a secure place. The filing system will be accessed via the designated safeguarding lead. Any electronic information will be password protected and only made available to relevant individuals.
286. Child protection information will be stored and handled in line with Data Protection Act 1998 principles such that information is:
- processed for limited purposes
  - adequate, relevant and not excessive
  - accurate
  - kept no longer than necessary
  - processed in accordance with the data subject's rights
  - secure
287. Every effort will be made to prevent unauthorised access, and sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage.

288. In relation to safeguarding, UK GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Information can be shared without consent if not doing so would place a child at risk. For further information regarding this please see the school's Data Protection policy.

## **Record transfers**

289. It is imperative that relevant child protection information is forwarded to the new/receiving establishment by the establishment that the subject child is departing and that this happens as quickly as possible.
290. Such information sharing should occur between designated safeguarding leads and/or principal as soon as possible and, in any event, within 5 days of the child's departure.
291. When a file is to be transferred, a 'Record of Child Protection File Transfer' should be completed and attached to the child protection file (see Appendix 12).
292. It is inappropriate to simply forward all relevant documentation as this leaves the former school with no record. Rather:
- where feasible, designated safeguarding leads from former and receiving schools should arrange to meet and share relevant information, with copies of relevant and appropriate documentation being provided, or
  - alternatively, telephone discussions should take place followed-up with appropriate summaries / chronologies and copies of key records
293. The new school/college should be provided with the **ORIGINAL** documentation.
294. Where a parent elects for home education, the child is from a traveller, migrant or Romany family, and/or where the receiving school's identity is not known, the designated safeguarding lead at the former school should contact children's social care for advice.

## **Access to child protection files**

295. The safety and welfare of a child must always be considered when making decisions whether to share confidential information.
296. A child who has a child protection file has the right to access their personal record. This is known as the right of subject access under the Data Protection Act 2018. Parents (i.e. those with parental responsibility in law) may exercise the right of subject access on behalf of their child if they are unable to act on their own behalf or give their permission. As a general guide, a child of 13 or older is expected to be mature enough to make this kind of request independently or provide permission.
297. Access to the information on file should be on a need-to-know basis among the staff. This can only be decided on a case-by-case basis. The confidentiality of the child and family should be respected as far as possible, but the welfare of the child is paramount. It would be unlikely that every member of staff needs to know the details of a case. Generally speaking, the closer the day-to-day contact with the child, the more likely the need to know an outline of the case. Essentially, if someone receives information in his/her professional capacity and the person giving that information believes it will be treated securely, and that belief is reasonable, then the recipient of the information will be under a duty to treat it securely.

## **External Bodies**

298. In the majority of cases, schools will be able to share personal information using the lawful basis of public task (personal data) and substantial public interest (special category data). There may

be circumstances were the child and family's consent to sharing should be sought. If consent has been withheld, this must be recorded, including the reason given for withholding consent. Exceptions to the requirement to gain consent are that if seeking such consent could:

- increase the risk of harm to the child or someone else
- undermine the prevention, detection or prosecution of a serious crime (a crime that causes or is likely to cause significant harm to a child, young person or adult)
- interfere with any potential investigation

299. The names of any other children, other than the pupil who is the subject of the record, should be removed when disclosing records, unless consent is obtained from the individual(s) concerned (or their parent/carer on their behalf). Care should be taken to ensure all identifying information is removed from the copy of the record to be shared.

300. Child protection information should not ordinarily be shared with agencies other than statutory agencies such as the Police (e.g. information should not be released to solicitors etc). Where such a request is made, advice should be sought from the proprietor and Natwest Mentor

301. If there is a police request for the child protection information, please ensure that the requesting officers provide a data request form. This form will show the information the police are requesting, who the request relates to, why the police are requesting the information, and the exemption they are relying on to process the information. The school should securely retain a copy of this form.

302. Conversations between designated personnel at different schools (e.g. sharing concerns or asking for information about sibling groups) are perfectly acceptable under the lawful bases of public task and substantial public interest. As mentioned, there may be occasions when consent is the most appropriate lawful basis, where possible consent should be sought from parents before such a conversation takes place. Any relevant child protection information coming to light should be carefully logged.

## **Retention of child protection files**

303. According to current guidance from the Records Management Society's Schools Retention Schedule, records must be kept (securely) until the subject's 25th birthday, after which they should be shredded (child protection records relating to children's social care involvement will be retained for much longer than this by the local authority in any event).

304. The Data Protection Act requires that schools, or other bodies that keep information, maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:

- file reference (or other unique identifier)
- file title (or brief description)
- number of files (and date range)
- the name of the authorising officer
- date action taken

305. This must be kept in the establishment record of destruction form.

## **Safeguarding procedures in the event of a partial or full school closure**

306. Appendix 13 outlines safeguarding procedures in the event of a partial or full school closure. These procedures should be read in conjunction with the main policy.

307. It is important in any event that safeguarding principles always remain the same:

- the best interests of children must always continue to come first
- if anyone in a school or college has a safeguarding concern about any child they should continue to act and act immediately
- a DSL or deputy should be available
- it is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children
- children should continue to be protected when they are online

## **Appendix 1: Designated safeguarding lead responsibilities**

The broad areas of responsibility for the designated safeguarding lead are:

### **Manage referrals**

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required
- support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required
- support staff who make referrals to the Channel programme
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- refer cases where a crime may have been committed to the police as required;
- where appropriate, take the lead in relation to early help support

### **Work with others**

The designated safeguarding lead is expected to:

- liaise with the principal to inform him or her of issues, especially ongoing enquiries under section 47/17 of the Children Act 1989 and police investigations
- as required, liaise with the case manager (as per Part Four of KCSIE 2021) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member)
- liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENDCOs or the named person with oversight for SEND in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- act as a source of support, advice and expertise for staff

### **Undertake training**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal designated safeguarding lead or person training, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so

- ensure each member of staff has access to and understands the school's Safeguarding and Child Protection policy and procedures, especially new and part time staff
- are alert to the specific needs of children in need, those with special educational needs and young carers
- are able to keep detailed, accurate, secure records of concerns and referrals
- understand and support the establishment with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with special education needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them

### **Raise Awareness**

The designated safeguarding lead should:

- ensure the school's Safeguarding and Child Protection policy is known, understood and used appropriately
- ensure the school's Safeguarding and Child Protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this
- ensure the Safeguarding and Child Protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the trust in this
- link with the local Safeguarding Partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding

The DSL is responsible for promoting educational outcomes of children with a social worker. The DSL will ensure staff know who these children are, understand their academic progress and attainment data and maintain a culture of high aspirations for this cohort.

### **Child protection file**

- Where children leave the establishment ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENDCOs or the named person with oversight for SEN in colleges, are aware as required
- In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives

## Availability

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

## Appendix 2: Designated looked after children (LAC) teacher

**responsibilities** The broad areas of responsibility for the designated LAC teacher are defined below. **General**

The designated LAC Teacher is expected to:

- take lead responsibility for LAC at the school, ensuring that their personal, emotional and academic needs are prioritised by providing strategic leadership across the school
- act as the central point of contact for LAC in the school, ensuring the school has appropriate arrangements in place to support pupils and minimise any disruption to learning
- work with virtual school heads (VSHs) to promote the education of LAC, ensuring a whole-school culture where the personalised learning needs of every looked-after child matters
- take lead responsibility for ensuring school staff understand the ways in which LAC's learning may be affected and how the school supports the educational achievement of these pupils
- take lead responsibility for the development and implementation of LAC's personal education plans (PEPs) in partnership with others
- ensure that any safeguarding concerns regarding LAC are quickly and effectively responded to
- liaise with the SENDCO to identify and support the SEND needs of LAC, and understand how to access further assessment and support where necessary
- respond appropriately to disclosures or concerns relating to the wellbeing of a LAC pupil
- keep detailed, accurate and secure records of arrangements, and any concerns, for LAC
- monitor LAC pupils at risk of harm or those that have been subjected to harm, providing support and ensuring their welfare
- contribute to the development and review of whole-school policies and procedures in relation to LAC

## Fostering a culture of inclusivity

The designated LAC teacher should promote a culture in which looked-after and previously looked- after children:

- can discuss their progress and be involved in setting their own targets, have their views taken seriously, and are supported to take responsibility for their own learning
- are prioritised in any selection of pupils who would benefit from one-to-one tuition, and that they have access to academic focused study support
- are encouraged to participate in school activities and in decision making within the school and the care system
- believe they can succeed and aspire to further and higher education or highly skilled jobs
- can discuss difficult issues (such as SEND, bullying, attendance) in a frank manner with a sympathetic and empathetic adult

## **Personal Education Plans**

The designated LAC teacher should:

- work closely with other teachers to assess pupils' educational needs and ensure personal education plans (PEPs) are created without delay
- ensure that PEPs are effective in supporting everyone to help the looked-after child to make good educational progress
- discuss with the pupil the best way for them to make progress and involve any relevant teachers in the discussion to arrange effective provision across the whole curriculum
- take responsibility for reviewing PEPs before the statutory review, ensuring they are up-to-date and contain any new information, including whether agreed provision is being delivered
- ensure PEPs are clear about what has or has not been taken forward, noting what resources may be required to further support the pupil and how these resources may be secured
- ensure that, for pupils with SEND, PEPs work in parallel with their education, health and care (EHC) plan

## **Liaison**

The designated LAC teacher should:

- work with services internally and externally to provide the required support for all looked after children. For example, intervention worker within school, looked after children's educational services (LACES), virtual school heads (VSHs) and police etc.
- contribute towards raising parents' awareness of the pupil premium plus and other support for LAC and encourage their involvement in deciding how the funding is used to support their child
- work directly with looked-after and previously looked-after children and their carers, parents or guardians to:
  - promote good home-school links
  - support progress by paying particular attention to effective communication with carers, parents or guardians
  - ensure carers, parents or guardians understand the potential value of one-to-one tuition and are equipped to engage with it at home
  - ensure carers, parents or guardians are aware of how the school teaches key skills such as reading and numeracy
  - encourage high aspirations and working with the child to plan for their future success and fulfilment

## **Being a source of advice for teachers**

The designated LAC teacher should:

- take lead responsibility for ensuring all staff members have strong awareness, training and skills relating to the specific needs of LAC and how to support them, e.g. with regard to attendance, homework and behaviour
- ensure all staff members have high expectations of LAC's learning and set targets to promote educational progress
- promote attachment and trauma awareness between staff members, ensuring they are aware of the emotional, psychological and social effects of loss and separation from birth families and how this impacts on pupils' behaviour
- ensure all staff members understand the importance of viewing LAC as individual pupils rather than a group of pupils, and that they are treated equally

- ensure staff members are aware of the training opportunities that are available to them
- maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals
- represent the school at meetings of designated leads and circulate the outcomes to staff members
- ensure staff members receive frequent updates regarding particularly susceptible LAC
- work with other institutions to ensure that pupils' transition to the next stage in their education is as smooth as possible, confirming that any other appropriate institutes have all the necessary documents
- where necessary, securely transfer pupils' personal files, as well as those containing child protection issues, to other educational establishments, ensuring that confirmation of receipt is obtained

### **Appendix 3: Safe working practices**

#### **Propriety and behaviour**

All staff are expected to:

- set high expectations and challenging targets for all pupils
- promote fundamental British values, including democracy, the rule of law, freedom of religion, individual liberty, freedom of speech, freedom of thought, freedom of association and mutual respect and tolerance of different faiths and beliefs, fairness, social responsibility, liberty and equality for all
- ensure that they set expectations of the highest standards of behaviour and conduct within school, regardless of whether in class or beyond, and challenge activities by any pupil that may be considered to be of an inappropriate nature
- must not unlawfully discriminate against pupils because of their protected characteristics and must consider how they are supporting pupils with protected characteristics.

All staff are expected to refrain from:

- making inappropriate remarks (including innuendoes) to, or about, a pupil
- discussing personal relationships with or in the presence of pupils
- discussing a pupil's personal relationships in inappropriate settings or contexts
- making unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such

All staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 is a criminal offence, even if that pupil is over the age of consent.

#### **Dress and appearance**

All staff are expected to wear clothing which:

- promotes a positive and professional image
- is appropriate to their role
- is not likely to be viewed as offensive, revealing or provocative
- does not distract, cause embarrassment or give rise to misunderstanding
- is absent of any political or otherwise contentious slogans
- is not considered to be discriminatory

## **Rewards and gifts**

All staff are expected to abide by the schools Gifts and Hospitality policy which clearly sets out when and how rewards and gifts may or may not be used/accepted.

## **Infatuations**

All staff are expected to report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff. This must be reported to a senior leader.

## **Photography, videos and other creative arts**

All staff are expected to:

- refrain from taking images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care; or making audio recordings of a child's disclosure
- refrain from making any visual recordings of pupils (still or moving), without the prior consent of a senior leader
- seek parental consent for a photograph/video to be taken or published
- ensure pupil's consent is obtained for the use of images/recordings after the age of 13 years old. This is in line with the Data Protection guidance
- ensure that the storage and distribution of such images/recordings is approved by senior leaders and care is taken to avoid illicit use of the images
- ensure that all images/recordings are available for scrutiny in order to screen for acceptability
- be able to justify images/recordings of children in their possession
- avoid making images/recordings in one-to-one situations
- refrain from taking images/recordings of pupils using personal mobile phones

## **Social contact**

All staff are expected to:

- always gain the approval of a senior leader in advance of any planned social contact with pupils or parents
- advise a senior leader of any (unplanned), social contact they have with a pupil which might cause concern
- report and record any situation which they feel might compromise the school or their own professional standing
- refrain from sending personal communication to pupils e.g. letters and cards unless agreed with a senior leader

## **Communication using technology**

All staff are expected to refrain from:

- passing personal contact details to pupils including email, home or mobile phone numbers
- any communication with pupils which may be construed as grooming
- making any visual recordings of pupils (still or moving), without the prior consent of a senior leader
- using any personal equipment when communicating with pupils

For the purposes of exchanging coursework or homework only, it is permitted for staff to exchange their school email address with pupils. However, any correspondence whilst using school email must be very cautious and perfunctory to avoid being misconstrued.

## **Physical contact**

All staff are expected to:

- refrain from touching pupils in a way which may be considered as indecent or for the gratification of the adult or the pupil
- avoid any gratuitous or unnecessary physical contact with pupils (this includes horseplay, tickling or stroking the head etc.)
- be prepared to explain actions and accept that all physical contact is open to scrutiny
- always encourage pupils, where possible, to complete self-care tasks independently
- avoid using physical contact as a reward (this includes hugs and pats on back etc.)
- ensure that physical contact is never secretive or represents a misuse of authority

### **Behaviour management and physical restraint**

All staff are expected to:

- try to defuse situations before they escalate
- ensure all rewards and sanctions are within the school's agreed Behaviour policy
- ensure parents are informed of all sanctions
- avoid the use of sarcasm or demeaning and insensitive comments towards pupils

Please see the Behaviour policy for full details on behaviour management strategies upheld by the school.

Some situations may give rise to the need for physical intervention. However, school staff must ensure that they have considered the pupil's safeguarding and welfare when restraint is used especially on a pupil with SEND. The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances. If an alternative method of control and restraint is possible then these methods should be used first. If physical contact is the only suitable method, then the use of 'reasonable force' is permitted.

Force is usually used either to 'control' or 'restrain'. This can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking up a fight or where a pupil needs to be restrained to prevent violence or injury. The key point to always remember is that 'reasonable in the circumstances' means using no more force than is needed for that situation.

The following list is not exhaustive but provides some examples of situations where reasonable force can be used:

- to remove disruptive children from the classroom where they have refused to follow an instruction to do so
- to prevent a pupil behaving in a way that disrupts a school event or a school trip or visit
- to prevent a pupil leaving the classroom where allowing the pupil to leave would risk their safety or lead to behaviour that disrupts the behaviour of others
- to prevent a pupil from attacking a member of staff or another pupil, or to stop a fight
- to restrain a pupil at risk of harming themselves through physical outbursts

Under no circumstances should staff use force as a punishment. Please see the school's Positive Handling policy for full guidance.

### **One-to-one situations**

All staff should:

- avoid meeting with pupils in remote, secluded areas of the school
- ensure that there is visual access and/or an open door in one-to-one situations

- inform other staff of the meeting beforehand, assessing the need to have them present or close by
- avoid any one-to-one situations with pupils that may result in an interpretation of secrecy
- always report any situation where a child becomes distressed or angry to a senior leader

### **Intimate care**

Some pupils may require intimate care – this may include support with toileting or removing soiled clothing. In supporting such children, staff should:

- ensure they have completed appropriate training
- take account of the school's Supporting Pupils with Medical Conditions policy
- adhere to a care plan agreed with parents for pupils requiring intimate care
- encourage pupils to act as independently as possible
- ensure that another member of staff is in close vicinity if intimate care is required
- record any instances of intimate care, justifying the need for any variations from the care plan
- share the need for intimate care with parents, if irregular or unexpected

### **Toileting, Showering and Changing**

#### **General Principles**

- Shower facilities should be, clean and well-maintained so that pupils' health and safety, privacy and dignity are not put at risk
- Suitable toilet and washing facilities should be provided for the sole use of pupils
- Suitable changing accommodation and showers should be provided for pupils aged 11 years or over at the start of the school year who receive physical education
- Where separate facilities are provided for pupils who are disabled, they may also be used by other pupils, staff, supply staff, volunteers and visitors, whether or not they are disabled
- As far as possible, members of staff should supervise or assist pupils of the same gender
- Wherever possible designated single sex changing room or areas should be used. If this is not possible and boys and girls change together, in a classroom for example, consideration should be given to utilising furniture or screens to provide discrete areas

All staff are expected to:

- avoid any physical contact when children are in a state of undress
- avoid any visually intrusive behaviour and, where there are changing rooms, announce their intention of entering
- avoid remaining in the room unless a pupil's needs require it (judgement will be based on the age and development needs of the pupils)
- take into account the needs of pupils from different religions, beliefs and cultural

backgrounds Where pupils need assistance, staff are expected to:

- take account of the intimate care section held within the 'Supporting Pupils with Medical Conditions' policy
- encourage pupils to be as independent as possible, giving verbal help before offering assistance

- provide assistance openly, not out of sight of others

All staff must not:

- change in the same place as children
- shower with children

When off-site showering and changing arrangements are in place:

- the above guidance will apply
- pupils will not share changing/toilet facilities with members of the public
- where changing facilities are shared with pupils from another school, adults from both schools will make appropriate arrangements and properly risk assess together

### **Visual access to classrooms**

All staff are expected to ensure that there is always visual access and/or an open door to their classrooms.

Where staff feel the need to cover the visual access to their door temporarily, they must be able to justify doing so on child protection grounds and must ensure that there is a second member of staff in the classroom at the time.

### **Administration of medication**

In dispensing medication to pupils, staff should:

- take account of the school's 'Supporting Pupils with Medical Conditions' policy
- ensure that they are authorised to dispense medication
- ensure that parental consent has been secured and recorded
- ensure that all medicines are stored in a locked cupboard, or if refrigerated, in an area not accessible to pupils
- record the storage, dispensing and disposal of medication
- not force a pupil to take medicine if they refuse to do so - in such a case, parents should be informed immediately and emergency services called if needed

Staff must also ensure that all personal medication is stored securely in a locked area at all times.

### **Transporting pupils in staff cars**

Pupils should only be transported in staff cars as a matter of last resort – where alternative modes of transport are unavailable and only when the pupil is not distressed in any way. Normally, this will mean when taking pupils home – trips should not be planned with the intention of using staff vehicles for transport. In transporting pupils using a staff vehicle:

- the consent of a senior leader should be secured on each occasion
- there should be at least one adult additional to the driver acting as an escort
- the member of staff should have 'Business' car insurance on their vehicle
- the member of staff should ensure that the car is roadworthy
- the pupil should sit at the back of the car – and be instructed to wear a seat belt

### **Transporting pupils in taxis**

If a situation requires a pupil to be transported in a taxi, staff will use a reputable company and seek permission from parent/care giver where possible.

When travelling in a taxi pupils' will:

- be instructed to wear a seatbelt.
- sit in the back of the taxi
- notification that the pupil has returned safe should be obtained

## Appendix 4: Safeguarding and Prevent Checklist

Please ensure all checks are complete.

Please be aware this is not an exhaustive list of all safeguarding measures.

No.	Key Actions	DSL	Head
Safeguarding Policy, Training, Procedures and Record Keeping			
1.	Ensure the schools Safeguarding Policy is fully compliant with government guidance and includes the Prevent duty, Channel process and FGM Duty.		
2.	Ensure the schools Safeguarding policy is available on staff shared drive alongside the supplementary government guides.		
3.	Ensure schools Safeguarding policy is uploaded to school website.		
4.	Ensure Parent Handbook outlines the school's approach to safeguarding.		
5.	Ensure there is evidence that Safeguarding Policy and KCSIE Part 1 has been disseminated to ALL staff at annual whole school training (e.g. registers, handouts).		
6.	Ensure Annual Safeguarding Declaration has been signed by all staff and all understand the responsibilities for safeguarding.		
7.	Retain evidence of any safeguarding updates shared with staff outside of the annual training (e.g. registers, handouts).		
8.	Ensure staff are aware of signs of abuse (including child on child and sharing nudes and semi-nudes ), Prevent duty, and duty to report discovery of FGM.		
9.	Ensure staff aware of the early help process and their role within it.		
10.	Ensure staff are aware of the fundamental British values and their role in ensuring pupils understand these.		
11.	Ensure schools Prevent risk assessment/action plan complete.		
12.	Ensure staff and governors are inducted into the school's own Prevent strategy (e.g. curriculum programme, policies and procedures).		
13.	Ensure there is a designated safeguarding lead (and at least one deputy) in place. There should also be a Prevent lead and designated teacher for looked after children.		
14.	Ensure designated safeguarding lead refresher training is up to date.		
15.	Ensure deputy designated safeguarding lead(s) refresher training is up to date.		
16.	Ensure designated safeguarding lead JD/PS (Appendix 1 Safeguarding and Child Protection Policy) filed in DSL's and DDSL's personnel file.		
17.	Ensure close communication between DSL and attendance lead in order to monitor all pupils particularly our susceptible pupils.		

No.	Key Actions	DSL	Head
19.	Ensure the local authority is informed when a pupil is deleted from the school register on any of the 15 grounds for deletion. Ensure that the local authority is aware of any missing information when a child is deleted from the school roll, such as the name of the destination school, or the address to which the child is moving. (This is to help identify children absent from education for prolonged periods or repeated occasions).		
20.	Ensure the designated LAC teacher has a separate job description.		
21.	Ensure SLT are familiar with the local safeguarding partners annual report. Consider the weaknesses/trends in the context of the school setting and make any necessary adjustments.		
22.	Ensure all staff know who the DSL/DDSL/Prevent officer are and how to contact/ report concerns via the safeguarding system.		
23.	Ensure all pupils know who the DSL/DDSL/Prevent officer are – display posters of the DSL/DDSL in key areas throughout the school.		
24.	Ensure pupils have a number of avenues through which to express their opinions and raise concerns.		
25.	Ensure the school works in line with locally agreed procedures when dealing with safeguarding issues.		
26.	Ensure chair of the local governing body and designated governor for safeguarding is aware of governing body responsibilities with respect to safeguarding and the Prevent duty.		
27.	Ensure there is evidence of regular meetings between the proprietor and designated safeguarding lead.		
28.	Ensure the head's report to the proprietor includes an update on safeguarding.		
29.	Ensure the Safeguarding Partners 157/175 Audit is completed annually.		
30.	Ensure safeguarding is a standing item on the LGB agenda and SLT agenda.		
31.	Ensure SLT Group records are clear, presentable and complete.		
32.	Ensure all pupils on a safeguarding or child protection plan have accurate and up to date records (including copy of the CP/CIN plan, clear chronology and meeting minutes)		
33.	Ensure procedures in place to deal with allegations of abuse against staff (including malicious allegations).		
34.	Ensure the schools HR team is informed as soon as the school are aware of any allegation against a staff member.		
35.	Ensure Safer Working Practices outline in Safeguarding Policy adhered to.		
36.	Ensure the school have more than one contact name and telephone number for each child.		
Safer Recruitment and Selection			

No.	Key Actions	DSL	Head
37.	Ensure schools Recruitment and Selection Policy is in place and safer recruitment principles are adhered to.		
38.	Ensure full recruitment records are available for all staff and volunteers in line with the recruitment checklist.		
39.	Ensure selection processes take child protection into account with evidence of child protection question asked at interview.		
40.	Ensure regular checks are completed termly by the head and the proprietor		
41.	Ensure one member of staff on any interview panel has completed safer recruitment training.		
42.	Ensure principal plus two members of SLT have completed refresher safer recruitment training every 3 years.		
Safe Environment			
43.	Ensure there are dedicated displays linked to key messages around fundamental British values, safeguarding and personal safety.		
44.	Ensure there are display posters signposting pupils in need to support (e.g. Child Line, NSPCC).		
45.	Ensure appropriate measures/controls for the storage of medication in place.		
46.	Ensure that there is a risk assessment for all movement across the estate and that all staff are following it.		
47.	Ensure that there is a complete, clear and presentable risk assessment of the FULL estate for the last three terms, and that their action points have been implemented.		
48.	Ensure there is a complete and up-to-date fire risk assessment for entire estate.		
49.	Ensure an appropriate supervision rota is in place.		
50.	Ensure all electronic access panels for all areas of the school are working and gates are closing (if applicable).		
51.	Check that all staff have and wear identity badges.		
52.	Ensure all visitors are required to sign in and out of school and given visitor badges and that staff and pupils are aware that they should challenge any individuals who are not known and not wearing visitor badge.		
53.	Ensure visitors have access to the school's 'Safeguarding Guide for Visitors' (see schools template)		
54.	Check that all HSE and other risk awareness posters are clearly presented across the estate.		
55.	Ensure appropriate web-cr in place (which is age-appropriate and includes monitoring of community languages).		
56.	Ensure all statutory checks are complete and evidenced.		

No.	Key Actions	DSL	Head
57.	Ensure appropriate first aid training is undertaken by relevant staff.		
58.	Ensure first aid boxes in place and appropriately signposted in school.		
59.	Ensure that a suitably detailed log of accidents is maintained and is up to date.		
60.	Ensure appropriate fire safety/marshal training is undertaken by relevant staff.		
61.	Ensure emergency evacuations take place on a termly basis and evidenced.		
62.	Ensure procedures for lockdown are in place		
63.	Ensure Health and Safety Policy in place.		
64.	Ensure written confirmation from alternative providers confirming the relevant checks have taken place.		
Other related policies and procedures			
65.	Ensure the strategic plan includes Prevent priorities.		
66.	Ensure school Anti-Bullying Policy in place and shared with staff.		
67.	Ensure Anti-Bullying approach outlined in Parent Handbook.		
68.	Ensure Anti-Bullying Policy available on school website.		
69.	Maintain a central log of bullying, racist and child on child abuse incidents that is up- to-date and verified – Ofsted will want to speak to a pupil recorded in it.		
70.	Ensure the mental health checklist is reviewed termly and there is an adequate number of mental health first aiders in school (in line with schools recommended numbers).		
71.	Ensure Volunteers Procedure implemented.		
72.	Ensure all external speakers are vetted, approved and recorded (including declarations) in line with the school External Speakers and Charities Policy and school Vetting and Due Diligence Policy.		
73.	Ensure all charitable activity is approved and recorded in line with the schools External Speakers and Charities Policy and schools Vetting and Due Diligence Policy.		
74.	Ensure staff familiar with school Staff Code of Conduct Policy.		
75.	Ensure pupils familiar with school Pupil Code of Conduct.		
76.	Ensure schools Complaints Policy uploaded to website and complaints dealt with according to process outlined within.		
77.	Ensure staff and Governors are familiar with Social Media Policy.		
78.	Ensure Home School Agreements (outlining commitment to FBV) completed for all pupils.		
79.	Ensure website outlines inclusive offer.		

No.	Key Actions	DSL	Head
80.	Ensure school Attendance and Punctuality Policy in place and procedures in place to respond to appropriately to children who go missing in education.		
81.	Ensure school trips are run in line with schools Off Site Visits / Requirements for Off Sites Visits and Adventurous Activities Policy and all trips approved via EVOLVE system.		
82.	Ensure school Whistleblowing Policy in place and uploaded to the school website.		
83.	Ensure school Supporting Pupils with Medical Conditions Policy in place and records relating to the medical needs register, administration of medication, support plans etc. up to date.		
84.	Ensure school Behaviour Policy, School Rewards and Sanctions, school Powers of Search Policy and school Use of Reasonable Force Policy in place and adhered to.		
85.	Ensure school Equal Opportunities Policy in place and adhered to.		
86.	Ensure school Equalities Policy in place and adhered to.		
87.	Ensure school Pupil ICT Acceptable Use Policy in place and adhered to.		
88.	Ensure school Electronic Information and Communications Policy in place and adhered to.		
89.	Ensure school Induction Policy in place and adhered to.		
90.	Ensure school PSHE Policy in place and adhered to.		
92.	Ensure school Sex and Relationships Education Policy in place and adhered to.		
93.	Ensure school SEN – Information, Policy and Guidance Policy in place and adhered to.		
94.	Ensure school Whole School Food Policy is in place and adhered to.		
95.	Ensure school Collective Worship Policy is in place and adhered to.		
96.	Ensure school Faith and Character Education Policy in place (Faith schools only).		
97.	Ensure Faith and Character Education training has been provided to all staff. (Faith schools only).		
98.	Ensure annual Faith and Character Education Policy declarations are complete for all staff (Faith schools only).		
99.	Ensure the school Faith and Character Education SEF is up to date (Faith schools only).		
100.	Ensure school data protection policy is in place and adhered to.		
Curriculum			
101.	Ensure there is a clear provision map for RHE/RSHE and the wider elements of PSHE.		
102.	Ensure an annual online safety review is completed to ensure the curriculum and supportive interventions reflect the risks the pupils face.		

No.	Key Actions	DSL	Head
103.	Ensure curriculum evidence teaching of e-safety.		
104.	Ensure curriculum promotes fundamental British Values.		
105.	Ensure pupils are taught how to stay safe outdoors, identify and respond appropriately to risk (Clever Never Goes Primary resources on Safeguarding Team Resources).		
Early Years			
106.	Ensure that EYFS leader and staff working in the early years have read and understood <u>'The statutory framework for the early years: setting the standards for learning, development and care of children from birth to five.'</u> This document sets out the minimum standards for care of children in the early years.		
107.	<p>Ensure that the specific staffing ratios for children aged 2,3 or 4 are adhered to and that Reception classes do not exceed infant class size regulations:</p> <p>For children aged 2:</p> <ul style="list-style-type: none"> <li>- there must be at least one member of staff for every 4 children</li> <li>- at least one member of staff must hold a full, relevant level 3 qualification</li> <li>- at least half of all other staff must hold a full, relevant level 2 qualification</li> </ul> <p>For children aged 3+:</p> <ul style="list-style-type: none"> <li>- where a person with QTS, EY Professional Status, EYTS or another suitable level 6 qualification is working directly with children:</li> <li>- there must be at least one member of staff for every 13 children</li> <li>- at least one other member of staff must hold a full and relevant level 3 qualification</li> </ul> <p>Where there is no person with QTS, EY Professional Status, EYTS or another suitable level 6 qualification working directly with children:</p> <ul style="list-style-type: none"> <li>- there must be at least one member of staff for every 8 children</li> <li>- at least one member of staff must hold a full and relevant level 3 qualification</li> <li>- at least half of all other staff must hold a full and relevant level 2 qualification</li> <li>- (Staff must be aged 17 or over to be counted within ratios. The school must be satisfied that an apprentice or pupil on long-term placement aged 17 + is competent before including them in a ratio)</li> </ul> <p>For Reception class, the minimum legal requirement is one fully qualified teacher for every 30 children.</p>		
108.	Ensure that a suitable induction process is in place that includes safeguarding of young children. This must include procedures for reporting concerns, administering medicine and the acceptable use of mobile phones/ technology.		
109.	Ensure that at least one person who has received up to date certified training in paediatric first aid (PFA) is available at all times when early years children are present.		
110.	<p>Ensure that:</p> <ul style="list-style-type: none"> <li>- written permission is received before any medication is administered</li> </ul>		

No.	Key Actions	DSL	Head
	<ul style="list-style-type: none"> <li>- where medicine is provided on prescription, this can only be administered if prescribed for the named child by a doctor, dentist, nurse or pharmacist</li> <li>- records must be kept of any medicine that is administered</li> <li>- staff must receive appropriate training before administering medicines</li> <li>- any staff medication is secured safely.</li> </ul>		
111.	Ensure that the dietary needs of children are known and acted upon. Ensure that hygienic facilities are in place for the preparation of healthy snacks and that fresh drinking water is always accessible.		
112.	Ensure that toilets and, where necessary, nappy changing facilities, are adequate and hygienic.		
113.	Ensure that a key person is identified for each child in the early years and that they are clear about their responsibilities with respect to this child.		
114.	Ensure that a supervision process is in place for all staff working with early years children that enables the confidential discussion of sensitive issues.		
115.	Ensure that arrangements can be made for staff to speak confidentially with parents and carers.		
116.	Ensure that clear processes are in place to ensure children are only released to individuals notified to the school, and that no children ever leave the premises unsupervised.		

### Annual Review Records

Term	Review Date	Completed by
Autumn		
Spring		
Summer		

## Appendix 5a: Staff Safeguarding declaration



# Annual Safeguarding Declaration

1. I have read and understood the school's Safeguarding and Child Protection Policy, including the appendices.
2. I have read and understood Part one of the DfE guidance 'Keeping children safe in education', (DfE 2024).
3. I have read and understood Part 5 of the DfE guidance 'Keeping children safe in education' (DfE 2024)
4. I have read and understood the school Staff Code of Conduct.
5. I have read and understood the Social Media and IT Policy.
6. I have completed the school's safeguarding training, including Prevent training.
7. I will adhere to the school's online safety and Acceptable Usage Policy.
8. I will adhere to the school's confidentiality policy.
9. I understand that supplementary safeguarding guidance is available at [www.gov.uk](http://www.gov.uk).
10. I agree to adhere to the protocols set out in the school's Safeguarding and Child Protection Policy, the Staff Code of Conduct and the DfE guidance 'Keeping Children Safe in Education', (DfE 2024).

Print name:

.....

Sign:

.....

Date: .....

## Appendix 5b: Head Teacher, Proprietor and DSL Safeguarding declaration



# Annual Safeguarding Declaration

1. I have read and understood the school's Safeguarding and Child Protection Policy, including the appendices.
2. I have read and understood the DfE guidance 'Keeping children safe in education', (DfE 2024).
3. I have read and understood the school Staff Code of Conduct.
4. I have read and understood the Social Media and IT Policy.
5. I have completed the school's safeguarding training, including Prevent training.
6. I will adhere to the school's online safety and Acceptable Usage Policy.
7. I will adhere to the school's confidentiality policy.
8. I understand that supplementary safeguarding guidance is available at [www.gov.uk](http://www.gov.uk).
9. I agree to adhere to the protocols set out in the school's Safeguarding and Child Protection Policy, the Staff Code of Conduct and the DfE guidance 'Keeping Children Safe in Education', (DfE 2024).
10. I understand the requirement expected of me in terms of safer recruitment.

Print name:

.....

Sign:

.....

Date:

.....

## Appendix 6: Safeguarding concern form

# Safeguarding Concern Form

CONFIDENTIAL



### PART 1: INTERNAL NOTIFICATION OF CHILD PROTECTION/WELFARE CONCERN TO THE DSL

<b>Name(s) of pupil:</b>		
<b>D.O.B.</b>		
<b>Class / Year</b>		
<b>What is the nature of your concern?</b>		
<ul style="list-style-type: none"> <li>- What are you most concerned about? i.e. physical, sexual, emotional abuse or neglect, self-harm, bullying, sexual exploitation, sexualised behaviour, honour-based abuse / forced marriage, e-safety issues, radicalisation, other ...</li> <li>- Have you had any previous concerns about this pupil? If so, what, when, action?</li> <li>- <b><i>If you have received a 'disclosure' from or about a child please complete Part 2 overleaf</i></b></li> </ul>		
<b>Are there any injuries of concern?</b>	Yes / No	
<b>Describe injury and complete 'Part 3: Body Map' to show where the injury is and its approximate size</b>		
<b>Any action already taken</b>		
<b>Signed</b>		
<b>Name</b>		
<b>Job title</b>		
<b>Time/Date</b>		
<b><i>If you have received a 'disclosure' from or about a child please complete Part 2 overleaf</i></b>		

## PART 2: RECORD OF 'DISCLOSURE' FROM / ABOUT A CHILD

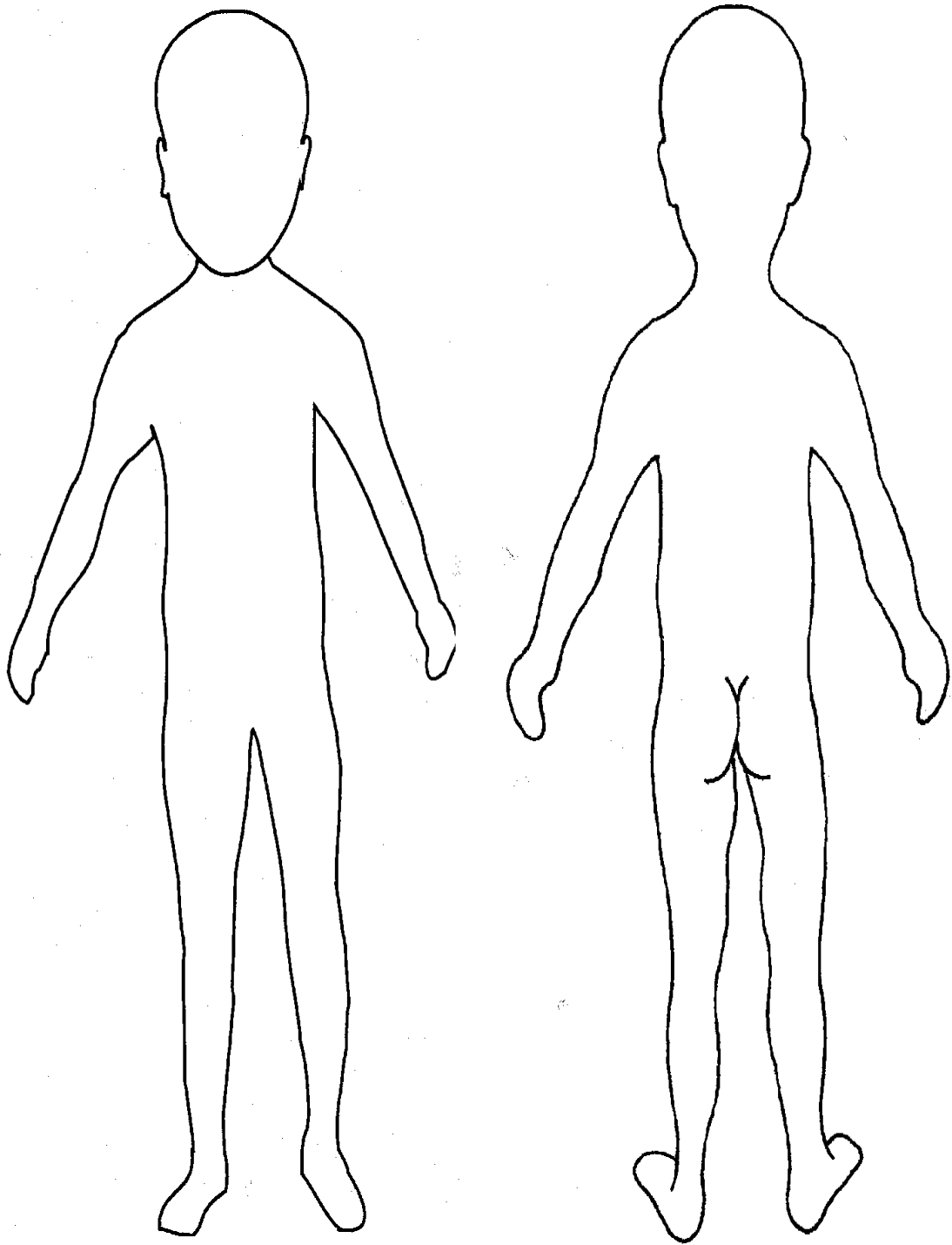
*\*It is not advisable to try and complete this record at the time. The important thing is to listen actively and carefully and reassure the child.*

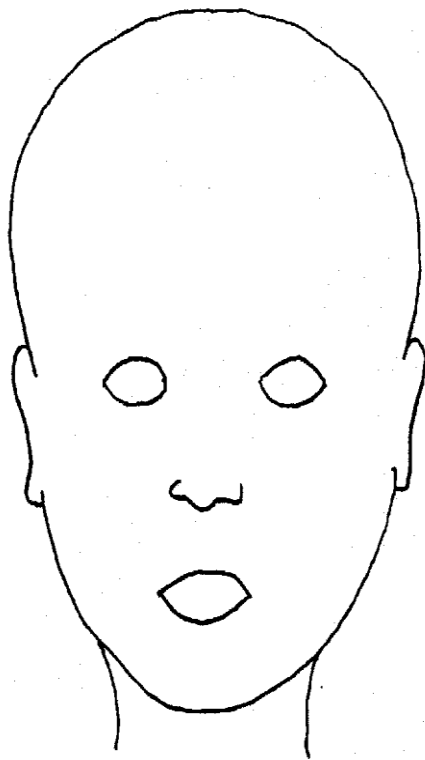
<b>Name of person to whom the 'disclosure' has been made</b>	
<b>Position / relationship with child</b>	
<b>How did the 'disclosure' come about i.e. when and where?</b>	
<b>Who was present when the disclosure was made?</b>	
<b>Summary of information disclosed</b>	

<b>WHO is said to be involved</b>	
<b>WHAT is said to have happened / be happening?</b>	
<b>WHERE is this said to have happened / be happening?</b>	
<b>WHEN is this said to have happened / be happening i.e. duration, most recent occasion etc?</b>	
<b>WHO else may have witnessed what happened?</b>	
<b>HOW and where is the pupil now?</b>	
<b>Continuation sheet added</b>	YES / NO
<b>Note:</b> <ul style="list-style-type: none"> <li>- Differentiate clearly between fact, opinion, interpretation and stick to the facts as you understand them wherever possible.</li> <li>- If you have used quotes please ensure that they are accurate.</li> <li>- Make a note of any open questions asked or minimal prompts used.</li> <li>- Any notes made 'at the time' should be attached to this pro-forma; these may be required as evidence if the matter goes to court.</li> </ul>	

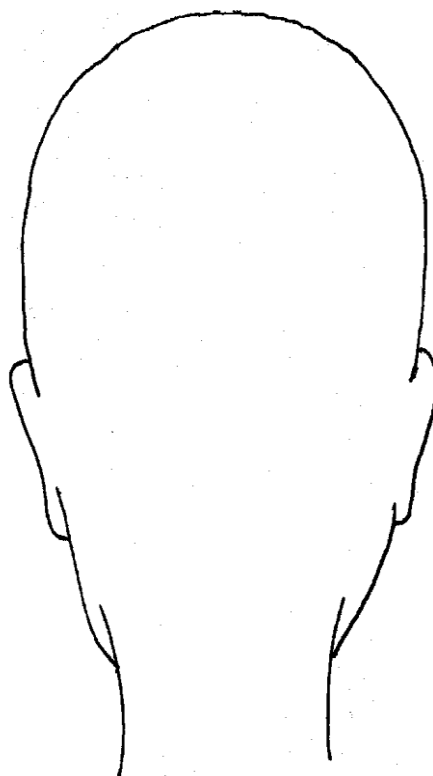
<b>Signed</b>	
<b>Name</b>	
<b>Job title</b>	
<b>Time/Date</b>	

### PART 3: BODY MAP

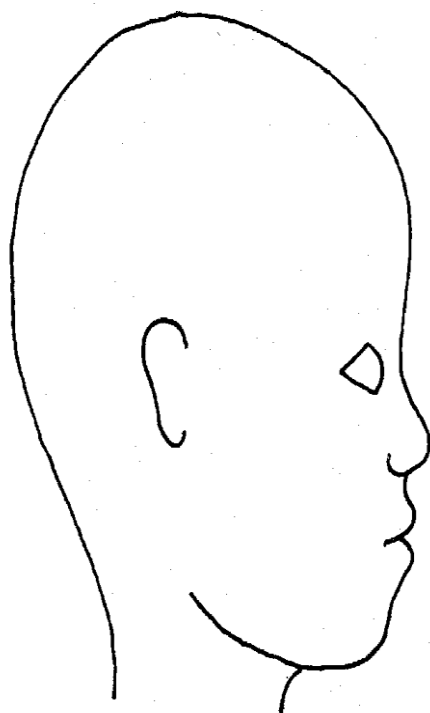




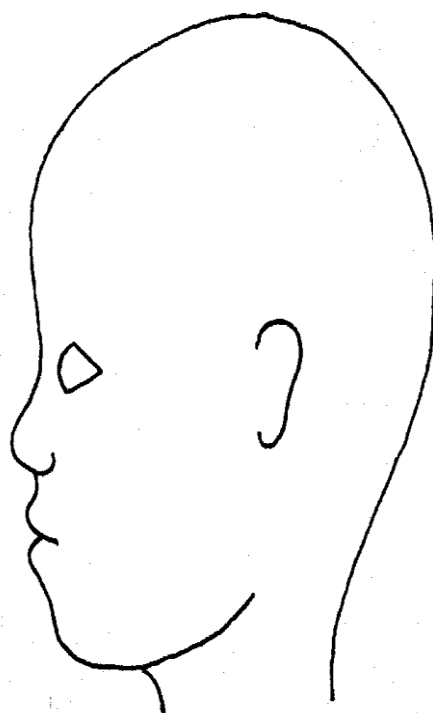
**FRONT**



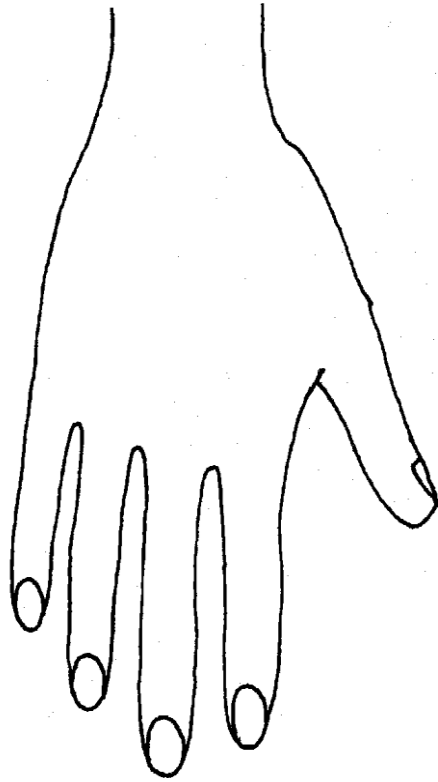
**BACK**



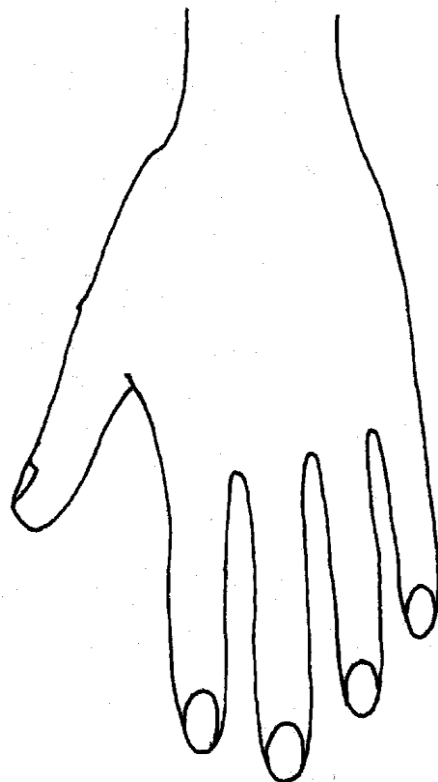
**RIGHT**



**LEFT**

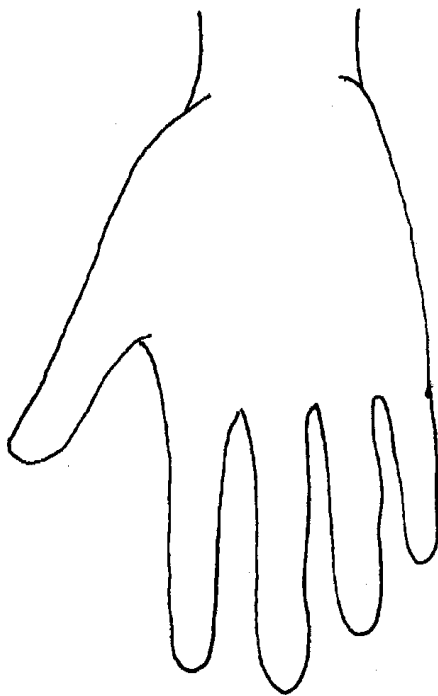


R

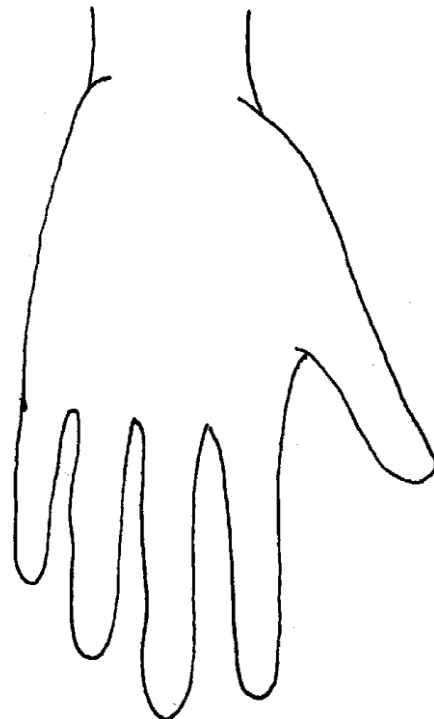


L

BACK

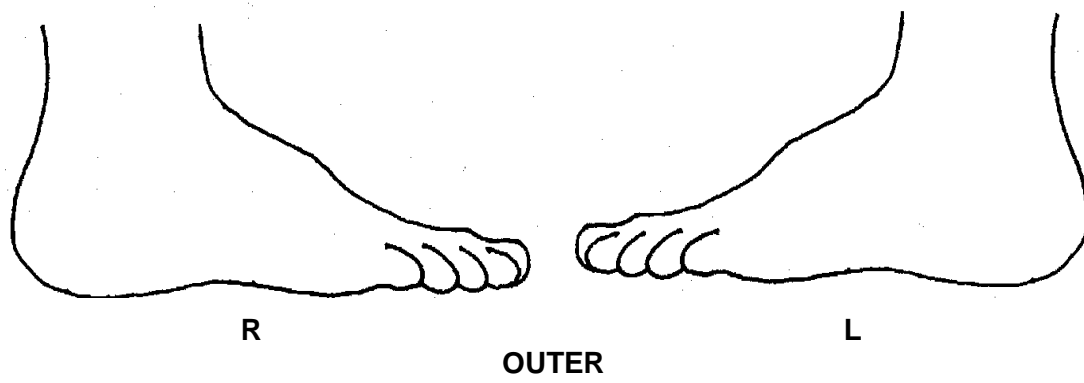
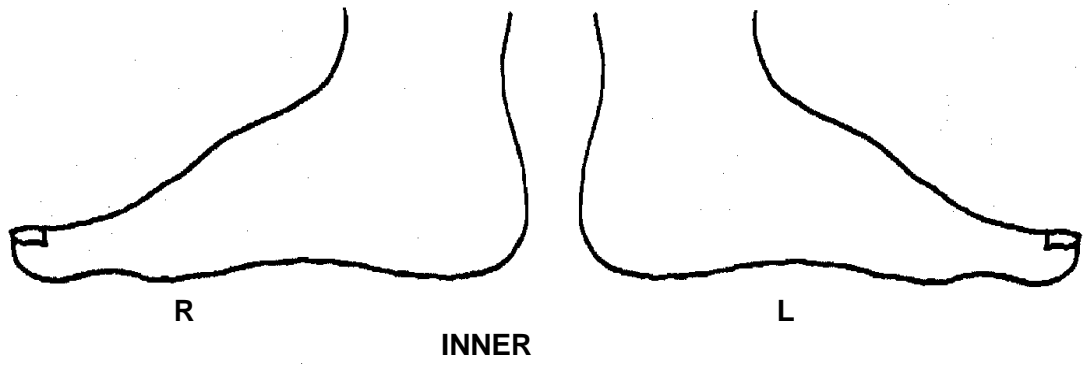
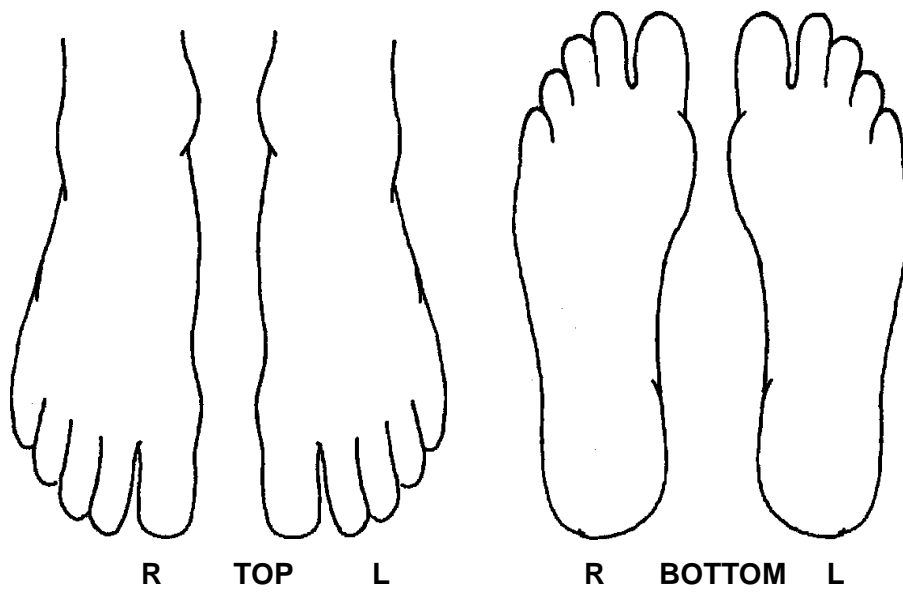


R



L

Front



#### PART 4: ACTION TAKEN BY DSL

<b>Time and date information received by DSL and from whom</b>	Time	
	Date	
	From	
<b>Action taken (internal &amp; external advice sought, referral to SENCO, Attendance Officer, Children's Social Care, continued monitoring etc)</b>  Include time, dates, names, who information shared with and when etc		
<b>Parents informed and reasons?</b>	Yes / No	
<b>Pupil Child Protection File created?</b>	Yes / No	
<b>Front Sheet populated ?</b>	Yes / No	
<b>Chronology Record started/updated</b>	Yes / No	
<b>Signed by DSL</b>		
<b>Name</b>		
<b>Time/Date</b>		

## Appendix 7: Safeguarding Risk Assessment – Allegations Against Staff

The purpose of the safeguarding risk assessment is to identify:



11. If there is any risk to children, young people or adults with whom the employee has contact with, in a position of trust
12. How any risk identified should be best managed
13. Whether the employee is safe to continue in their role
14. Any future implications should the employee continue in their role

### 1. BACKGROUND

Name:	
Designation:	
Establishment:	
Date DBS Checked:	
Outcome of DBS Check:	

1. Are any children present in the household of the employee:

(Yes/No) If yes, please provide gender and age details:

Gender	Age

2. Date of incident: \_\_\_\_\_
3. Context in which the alleged incident took place:

*See attached Statement from XX*

### 2. RISK ASSESSMENT FACTORS

On the basis of the evidence available, professional judgement and experience, the level of risk should be assessed as follows for the appropriate risk assessment factors below:

#### **Low risk (L):**

No safeguarding action is required and/or safeguarding issues have been addressed.

#### **Moderate risk (M):**

Safeguarding Protection Plan is required to manage the risk and/or remains in place.

**High risk (H):**

Protection Plan requires implementation. Legal action is being taken. The behaviour is persistent and/or deliberate

**Severe risk (S):**

Life may be in danger, risk of major injury or serious physical or mental ill harm. The incidents are increasing in frequency and/or severity.

<b>Risk Assessment Factor:</b>	<b>Risk L/M/H/S</b>
What is the specific allegation/offences?  <i>Assess the risk based on the gravity of the allegations or offence</i>	
Is the matter being dealt with by another professional agency e.g. Police or Local Authority Safeguarding Officer?	This question does not need to be rated.
If the matter is currently being dealt with by another agency, what is the current position of the investigation or intervention?	This question does not need to be rated.
How severe is the harm (threatened or inflicted) and are there any children and/or other susceptible adults involved?  <i>Assess severity of harm threatened or inflicted</i>	
Is there evidence to suggest that the harm is likely to continue or escalate?  <i>Assess the risk based on the likelihood of the harm continuing or escalating</i>	
Is there evidence to suggest that the harm was premeditated?  <i>Assess the likelihood of the harm involving premeditation</i>	
Is there evidence to suggest that the harm was accompanied by sustained threats or coercion?  <i>Assess the likelihood of the harm involving threats or coercion</i>	
Is there a pattern of history for this type of behaviour?  <i>Assess the level of risk based on previous behaviour, frequency and severity</i>	

What is the future risk of harm posed to the victim?	
What is the risk of harm posed to other children or adults?	
<i>What is the likelihood of harm to the child or adults</i>	
Have there been any previous concerns or complaints?	
<i>Assess the level of risk based on previous history, frequency and seriousness of issues</i>	
What has been the impact on the employee's health and wellbeing?	
<i>What is the level of risk based on the employee's current health</i>	
Is the employee receiving any medical support? If not, is this intended?	
<i>Assess the level of risk incurred from medication or existing treatment plan</i>	

### 3. RISK ASSESSMENT SUMMARY

Overall assessment of risks identified, including the risk to others:

Views and recommendations of professional agency e.g. Police/Local Authority or Safeguarding Officer:
Views and recommendations of Risk Assessor:
Views of Individual:
Overall Risk/ (Low/Moderate/High/Severe):

#### 4. AGREED ACTIONS

Consideration should be given to appropriate actions that will support the reduction of risk, for example, training and development, supervision, peer support alternative duties and access to occupational health services.

Action	Desired outcome	Timescale	Responsible Officer

Risk Assessor: \_\_\_\_\_ Signature: \_\_\_\_\_

Employee Name: \_\_\_\_\_ Signature: \_\_\_\_\_

Date of Risk Assessment: \_\_\_\_\_

Date of Review: \_\_\_\_\_

## Appendix 8: Safeguarding incident involving a member of staff and pupil in school



## Appendix 9: Child protection file – front sheet



### Child Protection

### File Front Sheet

<b>Pupil name</b>			
<b>Date of birth</b>			
<b>Any other name by which child is known</b>			
<b>Home address</b>		<b>Current address (if different)</b>	
<b>Contact tel no.</b>		<b>Contact tel no.</b>	
Family members i.e. parents / carers siblings			
<b>Name</b>	<b>Relationship</b>	<b>Address</b>	<b>School Details</b> (in the case of siblings)
<b>Date file started</b>			
<b>Are records held in school relating to other connected children?</b>			
<b>Contact details of other professionals</b>			
<b>Name</b>	<b>Agency</b>	<b>Address</b>	

## Appendix 10: Child protection file – removal of information record

### Child Protection File

### Removal of Information Record



<b>Pupil Information</b>	
<b>Pupil name</b>	
<b>Date of birth</b>	
<b>Removal of Information</b>	
<b>Date documents or complete file removed</b>	
<b>Name and role of person removing documents or complete file</b>	
<b>Signature of person removing documents or complete file</b>	
<b>List documents removed (or complete file)</b>	
<b>Reason for removal</b>	
<b>Replacement of Information</b>	
<b>Date documents or complete file replaced:</b>	
<b>Were all documents replaced?</b>	Yes / No
<b>If all documents are NOT replaced please record which documents have not yet been replaced, along with the location of such documents and reason for such documents not having been replaced.</b>	
<b>Name and role of person replacing documents or complete file</b>	
<b>Signature of person replacing documents or complete file</b>	

## Appendix 11: Child protection file – chronology of significant events

### Child Protection File

### Chronology of Significant Events



<b>Pupil name</b>	
<b>Date of birth</b>	

Date of event	Date info received/recorded	Significant event	Source of information	Actions taken and outcomes (include advice sought, dates, names, who information shared with and when etc)	Parents informed Y/N and reasons	Recorded by (full name and job title)

---

## Appendix 12: Child protection file - record of child protection file transfer

### Record of Child Protection File Transfer



#### PART 1: TO BE COMPLETED BY SENDING/TRANSFERRING SCHOOL

Name of child	
D.O.B.	
Name of school sending CP File	
Address of sending school	
Date file sent	
Name of Principal / Designated Safeguarding Lead	
Method of delivery	
Signature	

---

#### PART 2: TO BE COMPLETED BY RECEIVING SCHOOL

Name of school/college receiving file	
Address	
Date received	
Name of Principal/ Designated Safeguarding Lead receiving file	
Had the file been tampered with in transit?	
Signature	

---

## **Appendix 13: Safeguarding procedures in the event of a partial or full school closure Context**

Where there is a partial or full closure of the school, there is an expectation that there will be regular contact and support for susceptible children. Where possible, children identified as being susceptible will attend school.

Susceptible children include children who are supported by social care and those with safeguarding and welfare needs, including those with child in need plans or child protection plans, looked after children, young carers, disabled children and those with education, health and care (EHC) plans.

School leaders may also want to include other children facing social and emotional difficulties.

Eligibility for free school meals in itself should not be the determining factor in assessing vulnerability.

The school will continue to work with and support children's social workers to help protect susceptible children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. The lead persons for this will be the school's DSL and designated teacher for looked after children.

### **Designated safeguarding lead arrangements**

There will be trained DSL available either remotely or in person.

In addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site.

The DSL will continue to engage with social workers and attend all multi-agency meetings, which can be held remotely.

### **Supporting children not in school**

When children are unable to attend school, the school will continue to follow procedures for maintaining regular contact with pupils and families, including home visits where necessary.

Where there is a local lockdown requiring pupils to remain at home, the school will follow the guidance outlined above and offer immediate remote education.

Where required, individual remote education plans will be in place.

We recognise that younger children and some children with SEND may not be able to access remote education without adult support, and so the school will work with families to ensure the curriculum is appropriate for these children.

Remote education, where needed, is high quality and aligns as closely as possible with in-school provision.

We recognise that school is a protective factor for children and young people, and a school closure can negatively affect their mental health and wellbeing and that of their parents/carers. Teachers will take family wellbeing into account when setting expectations of pupils' work when they are at home.

School will continue to signpost children and their parents/carers, to a range of appropriate sources of support, within school and beyond school.

---

## **Supporting children in school**

School will continue to be a safe space for all children to attend and flourish.

The principal will ensure that appropriate staff are on site and that staff to pupil ratios are appropriate, to maximise safety.

Where the school has concerns about the impact of the absence of staff, such as the Designated Safeguarding Lead or first aiders, the Principal will discuss them immediately with the proprietor

Following a school closure, it is recognised that staff, parents/carers and children may experience some degree of anxiety about the return to school.

The school will plan to develop an inclusive culture so that everyone returns to a positive working environment. School will refer to the guidance on mental health and behaviour to help identify children who might need additional support, and to put this support in place.

Pastoral staff will be available for children and will be given the time to provide support as required.

The school will continue to signpost children and parents/carers, to a range of appropriate sources of support, in school and beyond school.

## **Reporting a concern**

The school will continue to use its normal referral processes for any children where it has concerns, in line with the school's Safeguarding and Child Protection Policy.

The school will continue to use its normal referral processes for any adults working with children where it has concerns, in line with the school's Safeguarding and Child Protection Policy.

## **Attendance recording and absence monitoring**

For appropriate coding of pupils, the school will follow guidance as set out by the school Attendance Lead.

Absence procedures for phone calls and home visits will be followed in line with the Safeguarding guidance for schools in the event of a school closure Standard Operating Procedure March 2020.

## **Safeguarding training and induction**

The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

All staff will maintain the view that 'it could happen here' and report any concern to the DSL or Deputy DSL.

## **Recruitment**

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the school will continue to follow the safer recruitment processes in line with the school's Recruitment and Selection Policy, Safeguarding Policy, and including, as appropriate, relevant sections in part 3 of Keeping children safe in education (2024).

---

Where new staff are recruited, or new volunteers enter the school, they will continue to be provided with a safeguarding induction.

### **Online safety in schools**

The school will continue to provide a safe environment including online. This includes the use of an online filtering system.

Where children are using computers in school, appropriate supervision will be in place.

### **Online safety away from school**

It is important that all staff who interact with children, including online, continue to look out for signs that a child may be at risk. Any such concerns should be dealt with as per the Safeguarding and Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

The school will ensure that there is a risk assessment in place relating to remote learning, which covers relevant aspects of safeguarding.

All staff are required to uphold the code of conduct that specifies professional expectations including language, behaviour and dress relating to online teaching.

All pupils are required to uphold the code of conduct specifying expectations of language, behaviour and dress relating to online learning.

All parents are required to uphold the code of conduct that includes safeguarding, including the expectation that they will not share material relating to their children's learning on social media.

Pupils will generally be taught in classes or groups. Occasionally, one-to-one teaching may be required. If this is the case, an individual risk assessment will be completed by the school focused on keeping both the pupil and the staff member safe.

The school will reassure themselves that any teaching/learning software and/or platforms are suitable and raise no privacy issues.

Any concerns about aspects of conduct raised in lessons by staff or pupils must be referred to the principal.

### **Pupil behaviour**

Where the school receives a report of bullying, racism or peer-on-peer abuse, it will follow the principles as set out in line with the school's Safeguarding and Child Protection and Behaviour policies.

The school will listen to and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded on the safeguarding platform and appropriate referrals made.

---

## Appendix 14- Contextual safeguarding- Safety Mapping

The safety mapping exercise has been designed for use by social workers but is suitable for any practitioners working with children and families. The overall aim is to gather information and understand where young people feel safe/at risk and to develop safety plans from this.

It is important that practitioners have a good understanding of the local environment before they complete the safety mapping exercise with young people.

When adapting this exercise for your own area you will first need to access maps. These can be accessed through your local authority or online, for example at [www.ordancesurvey.co.uk](http://www.ordancesurvey.co.uk). To ensure the maps are clear make sure to print each map in A3 size.

The safety mapping exercise forms the bulk of this activity to be carried out with young people. The aim is to work with young people to identify areas of safety and risk and to use this information to form the basis of a safety plan.

1. To begin, print a large map of the local area on A3.
2. Bring some stickers – green, orange and red that can be used to mark the map or some coloured pens.
3. Print Appendix C: the safety planning sheet.

Working with your young person, go through the map and ask them about where they feel safe, could be safe and feel unsafe. For each area get them to put a coloured sticker on the map.

**RED**



I do not feel safe in this area.

**AMBER**



I could be safe in this area.

**GREEN**



I feel safe in this area.

This could include whole areas or be as specific as certain streets, parks or shops. Using this exercise try and start a conversation with the young person about why they feel safe or unsafe there. This might include information about people or types of harm there.

Then start writing down the locations where the young person feels safe or unsafe and the reasons for this. Once you have completed the assessment of risk, working with the young person, start to develop a safety plan for them. This means helping them to consider who or what to do if they feel unsafe. For example, taking a location they have identified as 'red' you could ask them the following questions:

- What would they do if they feel unsafe?
- Is there anyone they know there who they could go to for help?
- What would they expect that person to do to help keep them safe?
- Do they have contact details accessible?

Once you have completed this, you should have developed a safety plan with the young person and helped them to think through areas of safety and risk. However, it is important that this does not end at this point. It is crucial that, in the case where young people do identify unsafe places, you work with other practitioners and services to consider ways to make them safer. This might include working with local park wardens, youth workers, licensing, police or the voluntary sector. On the occasions where the relocation of a young person is being considered, as part of this exercise and as a component of your wider assessment of risk, you will also need to think about safe spaces, networks and adults that do not appear on the map - these may be with family or friends that live in the borough that the child is moving to. In this instance, safety **must not** be considered achieved if no further work is undertaken both with the context the child is moving

---

from (i.e. continue to address the risks with the space) **and** there is no work undertaken with the context the child is moving to (with particular attention paid to safety plans for the child to move between the two contexts for example the transport routes etc.). In this situation, in order to properly assess risk, you should **also** complete a safety map of the location the child is moving to.

*NB: In order to make this a successful exercise both you and the young person must be able to clearly identify where they can achieve safety at the earliest opportunity should they find themselves in a risky situation.*

### **Safety planning after assessment**

Once you have completed the safety plan(s) it is important that it does not become a static document. This will mean updating and re-assessing the safety map with your young person regularly. It is also important that where young people identify risk, that this is followed up and an intervention plan is developed into those areas. Finally, where appropriate, plans may be brought together from multiple young people to support the analysis of trends and risks in different areas.

It is also important to pay attention and note safety features that may not appear on either map. These could be safe people or spaces in another borough. In this case, you will need to think about how long it might take them to get to safety or how long it may take for their safe person to get to them and what they will do to be as safe as possible within that time.

### **Safety planning with Children with additional needs**

Considerations should be given to learning styles of children involved with this activity. Practitioners are advised to use the physical map as a visual tool for children who have difficulty reading. This does not mean that the written safety plan cannot form part of the assessment but it is important that the children are left with a plan that they can understand or refer to. For example, a map which they have annotated for themselves with coloured stickers.