Child Protection and Safeguarding Policy

Statement of intent

Norton College is committed to safeguarding and promoting the welfare, both physical and emotional, of every student both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of students is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.
It will be achieved by:
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Teaching students how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any student that has been subject to abuse.
- Ensuring that members of the governing board, the Acting Head of School and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and know to refer concerns to the DSL.

Norton College Worcester - The DSL is: Rod Goold. In the absence of the DSL, child protection matters will be dealt with by Luke Goold.

Norton College Tewkesbury - The DSL is: Anna Phillips. In the absence of the DSL, child protection matters will be dealt with by Ashley Hurkett.

Approved by: ___Helen Ferguson_____ Date: _01/09/2020___

Chair of Directors___Edward Morris_____ Date: _01/09/2020___

Review Date: _01.09.2021___

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

1.2   For the purposes of this policy, "safeguarding and protecting the welfare of children" is defined as:
- Protecting students from maltreatment.
- Preventing the impairment of students' mental and physical health or development.
- Ensuring that students grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all students to have the best outcomes.

1.3   For the purposes of this policy, the term "harmful sexual behaviour" includes, but is not limited to, the following actions:
- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults

1.4   In accordance with the DfE's guidance, 'Sexual violence and sexual harassment between children in schools and colleges' (2018), and for the purposes of this policy, the term "sexual harassment" is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

1.5   For the purpose of this policy, the term "sexual violence" encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

1.6   For the purposes of this policy, "upskirting" refers to the act of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks (with or without clothing). Despite the name, anyone (including both students and teachers), and any gender, can be a victim of upskirting.

1.7   The term "teaching role" is defined as planning and preparing lessons and courses for students; delivering lessons to students; assessing the development, progress and attainment of students; and reporting on the development, progress and attainment of students. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Acting Head of School to provide such direction and supervision.

1.8   For the purpose of this policy, "peer-on-peer" abuse is defined as abuse between children. This can include, but is not limited to the following:
- Abuse within intimate partner relationships
- Bullying (including cyberbullying)
- Sexual violence and sexual harassment
- Physical abuse and physical harm

- Sexting
- Initiation/hazing-type violence and rituals

2. Legal framework

2.1 This policy has been created with due regard to all relevant legislation including, but not limited to, the following:
- Legislation
- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- The General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019

Statutory guidance

- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2020) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'

2.2 Other relevant school policies include:
- Child Sexual Exploitation (CSE) Policy
- Children Missing Education Policy
- Behavioural Policy
- Staff Code of Conduct
- Data Protection Policy
- Whistleblowing Policy
- Anti-Bullying Policy
- Exclusion Policy
- Online Safety Policy

3. Roles and responsibilities

3.1 The board of directors has a duty to:

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff members have due regard to relevant data protection principles that allow them to share (and withhold) personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Acting Head of School or another governor.
- Guarantee that there are effective child protection policies and procedures in place together with a Staff Code of Conduct.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that students are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff members are appropriately trained to support students to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in students, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.

- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff or volunteers.
- Confirm that there are procedures in place to make a referral to the Data Barring Scheme (DBS) and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle students' allegations against other students.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Make sure that students' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual students.
- Guarantee that there are systems in place for students to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the virtual school head (VSH) to discuss how the student premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the student's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for students who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

3.2 The Acting Head of School has a duty to:
- Safeguard students' wellbeing and maintain public trust in the teaching profession.
- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.

- Provide staff, upon induction, with the Child Protection and Safeguarding Policy, Staff Code of Conduct, part one of the 'Keeping children safe in education' (KCSIE) guidance, Behavioural Policy, the Children Missing from Education Policy, online safety training, and the identity of the DSL and any deputies.

3.3   The DSL has a duty to:
- Understand and keep up-to-date with local safeguarding arrangements.
- Act as the main point of contact with the three safeguarding partners and the child death review partner.
- Make the necessary child protection referrals to appropriate agencies.
- Understand when they should consider calling the police, in line with the National Police Chiefs' Council (NPCC) guidance. Included in appendices.
- Liaise with the Acting Head of School to inform them of safeguarding issues and ongoing enquiries.
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
- Understand the assessment process for providing early help and intervention.
- Support staff members in liaising with other agencies and setting up inter-agency assessments where early help is deemed appropriate.
- Keep cases of early help under constant review and refer them to the CSCS if the situation does not appear to be improving.
- Have a working knowledge of how LAs 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 Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Be alert to the specific requirements of children in need, including those with SEND and young carers.
- Keep detailed, accurate and secure records of concerns and referrals.
- Secure access to resources and attend any relevant training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Ensure the best educational outcomes by identifying at-risk students to the school and its staff, so that the relevant personnel understand each student's educational and welfare needs.
- Support teaching staff to identify the challenges that at-risk students may face and the additional academic support and adjustments they can make to support these students.

- Link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding.
- Ensure that a student's child protection file is copied when transferring to a new school.
- Be available at all times during school hours to discuss any safeguarding concerns. NB. The school will determine what "available" means, e.g. it may be appropriate to be accessible via electronic means, such as on the phone or using video conferencing software.
- Hold the details of the LA personal advisor and liaise with them as necessary.

3.4   The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

3.5   Other staff members have a responsibility to:
- Safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Provide a safe environment in which students can learn.
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Be aware of the early help process and understand their role in it.
- Act as the lead professional in undertaking an early help assessment, where necessary.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Be confident of the processing conditions under relevant data protection legislation, including information which is sensitive and personal, and information that should be treated as special category data.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.
- Follow the school's procedure for, and approach to, preventing radicalisation.
- Challenge senior leaders over any safeguarding concerns, where necessary.

4.   Inter-agency working

4.1   The school contributes to inter-agency working as part of its statutory duty.

4.2   The school is aware of and will follow the local safeguarding arrangements.

4.3   The school will work with CSCS, the police, health services and other services to protect the welfare of its students, through the early help process and by contributing to inter-agency plans to provide additional support.

4.4   Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

4.5   The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet students' needs and identify any need for early help.

4.6   Considering 4.3, staff members are aware that whilst the GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the student being placed at risk of harm.

4.7   Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students.

4.8   If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL.

4.9   The school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

5.   Abuse and neglect

5.1   All members of staff will be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another.

5.2   All staff, especially the DSL and their deputies, will be aware that students can at risk of abuse or exploitation in situations outside their families (extra-familial harms).

5.3   All staff members will be aware of the indicators of abuse and the appropriate action to take following a student being identified as at potential risk of abuse or neglect.

5.4   When identifying students at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Lack of concentration and acting withdrawn
- Knowledge ahead of their age, e.g. sexual knowledge.
- Use of explicit language
- Fear of abandonment
- Depression and low self-esteem

5.5	All members of staff will be aware of the indicators of peer-on-peer abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting.

5.6	All staff will be aware of the necessary procedures to follow to prevent peer-on-peer abuse, as outlined in section 30 of this policy.

5.7	All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and sexting, and will understand that these put students in danger.

5.8	Staff members will be aware of the effects of a student witnessing an incident of abuse, such as witnessing domestic violence at home.

**6.	Types of abuse and neglect**
6.1	Abuse: A form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, e.g. via the internet.

6.2	Physical abuse: A form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

6.3	Emotional abuse: A form of abuse that involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them, or often making them feel as though they are in danger.

6.4	Sexual abuse: A form of abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, and whether or not the child is aware of what is happening. This may involve physical assault, such as penetrative assault and touching, or non-penetrative actions, such as looking at sexual images or encouraging children to behave in inappropriate ways.

6.5	Neglect: A form of abuse that involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve providing inadequate food, clothing or shelter, or the inability to

protect a child from physical or emotional harm or ensure access to appropriate medical treatment.

7. FGM

7.1 For the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs.

7.2 FGM is considered a form of abuse in the UK and is illegal.

7.3 All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care and/or the police.

7.4 Teaching staff are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.
NB. The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

7.5 There are a range of potential indicators that a student may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the student.

7.6 Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

7.7 Indicators that may show a heightened risk of FGM include the following:
- The socio-economic position of the family and their level of integration into UK society
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE

7.8 Indicators that may show FGM could take place soon include the following:
- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

7.9 Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

7.10   Indicators that FGM may have already taken place include the following:
- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Prolonged or repeated absences from school followed by withdrawal or depression
- Reluctance to undergo normal medical examinations
- Asking for help, but not being explicit about the problem due to embarrassment or fear

7.11   Teachers will not examine students, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

7.12   FGM is also included in the definition of 'honour-based' abuse (HBA), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

7.13   All forms of HBA are forms of abuse and will be treated and escalated as such.

7.14   Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

8.   Forced marriage
8.1   For the purpose of this policy, a "forced marriage" is defined as a marriage that is 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 the marriage. Forced marriage is classed as a crime in the UK.

8.2   As part of HBA, staff will be alert to the signs of forced marriage including, but not limited to, the following:
- Becoming anxious, depressed and emotionally withdrawn with low self-esteem
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia
- Displaying a sudden decline in their educational performance, aspirations or motivation
- Regularly being absent from school
- Displaying a decline in punctuality
- An obvious family history of older siblings leaving education early and marrying early

8.3   If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

9.   Child sexual exploitation (CSE)

9.1   For the purpose of this policy, "child sexual exploitation" is defined as: a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or increased status of the perpetrator or facilitator

9.2   CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

9.3   The school has adopted the following procedure for handling cases of CSE, as outlined by the DfE:
Identifying cases

9.4   School staff members will be aware of and look for the key indicators of CSE; these are as follows:

- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant

Other indicators outlined in 10.3 may also be signs that a child is a victim of CSE
Referring cases

9.5   Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.
Support

9.6   The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

10.   Child criminal exploitation (CCE)

10.1   For the purpose of this policy, "child criminal exploitation" is defined as: where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, for any, or all, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

10.2   CCE may be in effect even if the criminal activity appears consensual and can happen through the use of technology.
Identifying cases

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10.3 School staff will be aware of the following indicators that a child is the victim of CCE:
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education or not taking part

11.   Mental health

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

11.2 Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional.

11.3 Staff will be encouraged to identify students whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one.

11.4 Staff who have a mental health concern about a student that is also a safeguarding concern will act in line with this policy and speak to the DSL or a deputy.

11.5 The school will access a range of advice to help them identify students in need of additional mental health support, including working with external agencies.

12.   Homelessness

12.1 The DSL and deputy(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

12.2 Indicators that a family may be at risk of homelessness include the following:
- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because "they have to"

12.3 Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

12.4 For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

13.   County lines

13.1   For the purpose of this policy, "County lines" refers to organised criminal networks or gangs exploiting children to move drugs and money into one or more areas (within the UK). Drugs and money may also be stored by children for the purpose of criminal activity.

13.2   Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs.

13.3   Staff members who suspect a student may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

13.4   The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

13.5   Indicators that a student may be involved in county lines active include the following:
- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in school results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

14.   Serious violence

14.1   Through training, all staff will be made aware of the indicators which may signal a student is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to, the following:
- Increased absence from school
- A change in friendships
- New relationships with older individuals or groups
- A significant decline in academic performance
- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions

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

- A history of committing offences
- Substance abuse
- Anti-social behaviour
- Truancy
- Peers involved in crime and/or anti-social behaviour

14.3   Staff members who suspect a student may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

15.   Students with family members in prison

15.1   Students with a family member in prison will be offered pastoral support as necessary.

15.2   They will receive a copy of 'Are you a young person with a family member in prison' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

16.   Students required to give evidence in court

16.1   Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

16.2   Students will also be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

17.   Contextual safeguarding

17.1   Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and their deputy(s), will always consider the context of incidents – this is known as contextual safeguarding.

17.2   Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

17.3   The school will provide as much contextual information as possible when making referrals to CSCS.

18.   Preventing radicalisation

18.1   For the purpose of this policy, we have used the following definitions:
- "Radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies
- "Extremism" refers to the vocal or active opposition to fundamental British values, e.g. individual liberty and the rule of law
- "Terrorism" refers to an action that endangers or causes serious violence to a person or people, property, or electronic system, which is designed to influence the government, intimidate the public, or advance a cause.

18.2   Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.

18.3   The school will actively assess the risk of students being drawn into terrorism.

18.4   Staff will be alert to changes in students' behaviour which could indicate that they may be in need of help or protection.

18.5   Staff will use their professional judgement to identify students who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. The school will work with local safeguarding arrangements as appropriate.

18.6   The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.

18.7   Any concerns over radicalisation will be discussed with a child's parents, unless the school has reason to believe that the child would be placed at risk as a result.
Training

18.8   The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.
Risk indicators of vulnerable students

18.9   Indicators of an identity crisis include the following:
- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

18.10   Indicators of a personal crisis include the following:
- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

18.11   Indicators of vulnerability through personal circumstances includes the following:
Migration
Local community tensions
Events affecting their country or region of origin
Alienation from UK values
A sense of grievance triggered by personal experience of racism or discrimination

18.12   Indicators of vulnerability through unmet aspirations include the following:
- Perceptions of injustice
- Feelings of failure

- Rejection of civic life
- Indicators of vulnerability through criminality:
- Experiences of dealing with the police
- Involvement with criminal groups

Making a judgement

18.13 When making a judgement, staff will ask themselves the following questions:
- Does the student have access to extremist influences?
- Does the student access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the student has been, or is likely to be, involved with extremist organisations?
- Is the student known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the student sympathise with or support illegal/illicit groups?
- Does the student support groups with links to extremist activity?
- Has the student encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the student?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the student?
- Has there been a significant shift in the student's outward appearance that suggests a new social, political or religious influence?
- Has the student come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the student vocally support terrorist attacks, either verbally or in their written work?
- Has the student witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the student travelled for extended periods of time to international locations?
- Has the student employed any methods to disguise their identity?
- Does the student have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the student display a lack of affinity or understanding for others?
- Is the student the victim of social isolation?
- Does the student demonstrate a simplistic or flawed understanding of religion or politics?
- Is the student a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the student have insecure, conflicted or absent family relationships?
- Has the student experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?

- Is there evidence that a significant adult or other person in the student's life has extremist views or sympathies?

18.14 Critical indicators include where the student is:
- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

18.15 Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

18.16 The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

Channel programme

18.17 Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable student is at risk of being involved in terrorist activities.

18.18 In cases where the school believes a student is potentially at serious risk of being radicalised, the Acting Head of School or DSL will contact the Channel programme.

18.19 The DSL will also support any staff making referrals to the Channel programme.

18.20 The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

18.21 The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.

18.22 The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

18.23 The school will keep in mind that an individual's engagement with the Channel programme is voluntary at all stages.
Extremist speakers

18.24 SMT will prevent speakers who may promote extremist views from using the school premises.
Building children's resilience

18.25 The school will:
- Provide a safe environment for debating controversial issues.
- Promote fundamental British values, alongside students' spiritual, moral, social and cultural development.
- Allow students time to explore sensitive and controversial issues.
- Provide students with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip students to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach students about how democracy, government and law making/enforcement occur.
- Teach students about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Resources

18.26 The school will utilise the following resources when preventing radicalisation:
- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The Educate Against Hate website

19. A child missing from education
19.1 A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation.

19.2 Staff will monitor students that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing Education Policy.

19.3 The school will inform the LA of any student who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.
Admissions register

19.4   Students are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the student will first be attending.

19.5   The school will notify the LA within five days of when a student's name is added to the admissions register.

19.6   The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.

19.7   Two emergency contact details will be held for each student where possible.

19.8   Staff will monitor students who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

19.9   If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:
- The full name of the parent with whom the student will live
- The new address
- The date from when the student will live at that address

19.10   If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:
- The name of the new school
- The date on which the student first attended, or is due to attend, that school

19.11   Where a student moves to a new school, the school will use a secure internet system to securely transfer students' data.

19.12   To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any student who is going to be deleted from the admission register, in accordance with the Education (Student Registration) (England) Regulations 2006 (as amended), where they:
- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the student continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.

Have been permanently excluded.

19.13 The school will also remove a student from the admissions register where the school and LA has been unable to establish the student's whereabouts after making reasonable enquiries into their attendance.

19.14 If a student is to be removed from the admissions register, the school will provide the LA with the following information:
- The full name of the student
- The full name and address of any parent with whom the student lives
- At least one telephone number of the parent with whom the student lives
- The full name and address of the parent with whom the student is going to live, and the date that the student will start living there, if applicable
- The name of the student's new school and the student's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Student Registration) (England) Regulations 2006 (as amended)

19.15 The school will work with the LA to establish methods of making returns for students back into the school.

19.16 The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown.

19.17 The school will also highlight any other necessary contextual information including safeguarding concerns

20.   Students with SEND
20.1   The school recognises that students with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of students.

20.2   Staff will be aware of the following:
- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Students with SEND can be disproportionally impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

20.3   When reporting concerns or making referrals for students with SEND, the above factors will always be taken into consideration.

20.4   When managing a safeguarding issue relating to a student with SEND, the DSL will liaise with SMT as well as the student's family where appropriate, to ensure that the student's needs are effectively met.

21.   Alternative provision

21.1   The school will remain responsible for a student's welfare during their time at an alternative provider.

21.2   When placing a student with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

22.   Work experience

22.1   When a student is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place.

22.2   Where the school has students conduct work experience at the school, an enhanced DBS check will be obtained if the student is over the age of 16.

23.   Private fostering

23.1   Where the school becomes aware of a student being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

24.   Concerns about a student

24.1   If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or a deputy.

24.2   All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in section 31 of this policy.

24.3   Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL with the matter.

24.4   If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

24.5   The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer.

24.6   Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the student.

24.7   If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the student.

24.8   If early help is appropriate, the case will be kept under constant review. If the student's situation does not improve, a referral will be considered.

24.9 All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely on CPOMS.

24.10 If a student is in immediate danger, a referral will be made to CSCS and/or the police immediately.

24.11 If a student has committed a crime, such as sexual violence, the police will be notified without delay.

24.12 Where there are safeguarding concerns, the school will ensure that the student's wishes are always taken into account, and that there are systems available for students to provide feedback and express their views.

24.13 When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the student feels like they are being listened to and believed.

24.14 An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

25. Early help
25.1 Early help means providing support as soon as a problem emerges, at any point in a child's life.

25.2 Any student may benefit from early help, but in particular staff will be alert to the potential need for early help for students who:
- Have SEND (whether or not they have a statutory EHC plan).
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.

25.3 Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

25.4 All staff will be made aware of the local early help process and understand their role in it.

25.5 The DSL will take the lead where early help is appropriate.

26.   Managing referrals

26.1 The reporting and referral process outlined in Appendix B will be followed accordingly.

26.2 All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed.

26.3 When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

26.4 The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the students involved.

26.5 The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

26.6 Where a student has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

26.7 The school will not wait for the start or outcome of an investigation before protecting the victim and other students: this applies to criminal investigations as well as those made by CSCS.

26.8 Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the student is at risk of harm.

26.9 Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

26.10 At all stages of the reporting and referral process, the student will be informed of the decisions made, actions taken and reasons for doing so.

26.11 Discussions of concerns with parents will only take place where this would not put the student or others at potential risk of harm.

26.12 The school will work closely with parents to ensure that the student, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

27.   Concerns about staff members and safeguarding practices

27.1   If a staff member has concerns about another member of staff (including supply staff and volunteers), it will be raised with the Acting Head of School.

27.2   If the concern is with regards to the Acting Head of School, it will be referred to the chair of governors.

27.3   Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.

27.4   If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

27.5   Any allegations of abuse made against staff members, including those that meet the harms test, will be dealt with in accordance with the school's Allegations of Abuse Against Staff Policy.

27.6   For the purpose of this policy, the "harms test" refers to a situation where a person would pose a risk of harm if they continued to work in regular or close contact with students in their present position, or in any capacity.

28.   Dealing with allegations of abuse against staff

28.1   All allegations against staff, supply staff and volunteers, will be dealt with in line with the school's Allegations of Abuse Against Staff Policy – a copy of which will be provided to, and understood by, all staff.

28.2   The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

28.3   On conclusion of a case, where an individual is removed from regulated activity – this could be due to suspension, redeployment to work that is not in regulated activity, dismissal or resignation – the school will refer the case to the DBS as soon as possible.

28.4   If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to CSCS.

28.5   The school will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry in question.

29.   Allegations of abuse against other students (peer-on-peer abuse)

Sexual harassment

29.1   Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a student's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

29.2   Sexual harassment includes:
- Sexual comments.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against another student.
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

Sexual violence

29.3   Sexual violence refers to the three following offences:
- Rape: A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- Harmful sexual behaviours

29.4   The term "harmful sexual behaviour" is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

29.5   Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not) and where the child may have SEND.

A preventative approach

29.6   In order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the school will educate students about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.

29.7   The school will also ensure that students are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:
- Healthy relationships
- Respectful behaviour
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual violence and sexual harassment is always wrong
- Addressing cultures of sexual harassment

29.8   Students will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled

Awareness

29.9   All staff will be aware that students of any age and sex are capable of abusing their peers and will never tolerate abuse as "banter" or "part of growing up".

29.10   All staff will be aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.

29.11   All staff will be made aware of the heightened vulnerability of students with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the student's SEND and will always explore indicators further.

29.12   LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children.

29.13 The school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.

29.14 Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Support available if a child has been harmed, is in immediate danger or at risk of harm

29.15 If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to CSCS.

29.16 Within one working day, a social worker will respond to the referrer to explain the action that will be taken.
Support available if early help, section 17 and/or section 47 statutory assessments are appropriate.

29.17 If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

Support available if a crime may have been committed

29.18 Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to CSCS. The DSL will be aware of the local process for referrals to both CSCS and the police.

29.19 Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.

29.20 The school has a close relationship with the local police force and the DSL will liaise closely with the local police presence.

Support available if reports include online behaviour

29.21 Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

29.22 If the incident involves sexual images or videos held online, the Internet Watch Foundation will be consulted to have the material removed.

29.23 Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

Managing disclosures

29.24 Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.

29.25 If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSCS where necessary. If staff are in any doubt, they will speak to the DSL.

29.26 Where an alleged incident took place away from the school or online but involved students from the school, the school's duty to safeguard students remains the same.

29.27 Staff will be trained to handle disclosures. Effective safeguarding practice includes:
- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.
- Explaining to the victim what the next steps will be and who the report will be passed to.
- Recognising that the person the child chose to disclose the information to is in a position of trust.
- Being clear about boundaries and how the report will be progressed.
- The DSL will be informed of any allegations of abuse against students.

Confidentiality

29.28 The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.

29.29 The DSL will consider the following when making confidentiality decisions:
- Parents will be informed unless it will place the victim at greater risk.
- If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to CSCS.
- Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.

29.30 The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

Anonymity

29.31   There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.

29.32   When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

Risk assessment

29.33   The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

29.34   Risk assessments will consider:
- The victim.
- The alleged perpetrator.
- Other children at the school, especially any actions that are appropriate to protect them.

29.35   Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's Data Protection Policy.

Taking action following a disclosure

29.36   The DSL or a deputy will decide the school's initial response, taking into consideration:
- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the children involved.
- Any power imbalance between the children.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
- The best interests of the child.
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

29.37   Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.

29.38   For reports of rape and assault by penetration, whilst the school establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The school will

consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.

29.39 For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.

29.40 In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

Managing the report

29.41 The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

29.42 There are four likely outcomes when managing reports of sexual violence or sexual harassment:
- Managing internally
- Providing early help
- Referring to CSCS
- Reporting to the police

29.43 Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.

29.44 The following situations are statutorily clear and do not allow for contrary decisions:
- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Managing internally

29.45 In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support. Providing early help

29.46 The school may decide that statutory interventions are not required, but that students may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent the escalation of sexual violence.

Referral to CSCS

29.47 If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to CSCS. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with CSCS.

29.48 The school will not wait for the outcome of an investigation before protecting the victim and other children.

29.49 The DSL will work closely with CSCS to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.

29.50 If CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.

29.51 If the school agrees with the decision made by CSCS, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

Reporting to the police

29.52 Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to CSCS. The DSL and deputies will follow the local process for referral.

29.53 Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with CSCS and any appropriate specialist agencies.

29.54 The DSL and Directors will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.

29.55 The DSL will be aware of local arrangements and specialist units that investigate child abuse.

29.56 In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

Bail conditions

29.57 Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.

29.58 The school will work with CSCS and the police to support the victim, and if in attendance at the school; alleged perpetrator and other children (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.

29.59 The term 'released under investigation' (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail.

29.60 Where bail is deemed necessary, the school will work with CSCS and the police to safeguard children – ensuring that the victim and/or alleged perpetrator can continue in their normal routine and continue to receive a suitable education.

29.61 The school will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made.

29.62 The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The end of the criminal process

29.63 Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's education package.

29.64 The school will ensure that the victim and perpetrator remain protected from bullying and harassment (including online, so far as the school is practicably able).

29.65 Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the school will offer support to the victim and alleged perpetrator for as long as the placement is maintained. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer suggestions for support.

29.66 The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

29.67 Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:
- The terminology the school uses to describe the victim
- The age and developmental stage of the victim
- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like

29.68 Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

29.69 Victims may struggle in the normal college environment. Whilst it is important not to isolate the victim, the victim may wish to have adjustments made to their individual education offer. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.

29.70 The school will provide a physical space for victims to withdraw to.

29.71 Victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies for as long as the placement is maintained.

29.72 Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.

29.73 If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents. All considerations will be discussed through Annual Review process and the Local Authority will be invited/informed.

29.74 If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

29.75 When considering the support required for an alleged perpetrator, the school will take into account:
- The terminology they use to describe the alleged perpetrator or perpetrator.
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
- Their age and developmental stage.
- What a proportionate response looks like.
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.

29.76 When making a decision, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.

29.77 If the alleged perpetrator moves to another school (for any reason), the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.

29.78 The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the student understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

29.79 Action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and adjusting the education package or reviewing the placement offer accordingly.

29.80 The school will make such decisions on a case-by-case basis, with the DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.

29.81 The school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.

29.82 Action and support can take place at the same time.

29.83 The school will be clear whether action taken is disciplinary, supportive or both.

29.84 Shared classes

29.85 Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of the student will always come first.

29.86 Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim (where applicable) and potential contact on school premises and transport will be prevented. The school may consider changing the educational package to minimise contact.

29.87 Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach and result in the view that allowing the perpetrator to remain in the school would harm and be detrimental to the education or welfare of the victim and potentially other students.

29.88 Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable options, including changing the education package and loss of placement. If the perpetrator will remain at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

29.89 Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

29.90 In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents and carers

29.91 In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

29.92 The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

29.93 Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

29.94 All relevant policies regarding how the school will handle reports of sexual violence and information about how victims and alleged perpetrators will be supported will be made available to parents.

Safeguarding other children

29.95 Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.

29.96 It is likely that children will "take sides" following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

29.97 The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

29.98 As part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

30.   Communication and confidentiality

30.1   All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.

30.2   Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents.

30.3   Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the students involved in the case.

30.4   Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.

30.5   During the disclosure of a concern by a student, staff members will not promise the student confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

30.6   Where it is in the public interest, and protects students from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime.

30.7   Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others.

30.8   Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim.

30.9   Depending on the nature of a concern, the DSL will discuss the concern with the parents of the students involved.

30.10   Discussions with parents will not take place where they could potentially put a student at risk of harm.

30.11   Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.

30.12   Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, etc., with the reasons behind decisions being explained and the available support discussed.

30.13   External agencies will be invited to these discussions where necessary.

30.14   Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

30.15   Where a student is leaving the school, the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their arrival.

31.   Online safety
31.1   As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online.

31.2   Through training, all staff members will be made aware of the following:
- Student attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a student's online activity

31.3   The school will ensure that suitable filtering systems are in place to prevent children accessing terrorist and extremist material, in accordance with the school's Data and E-Security Breach Prevention and Management Plan.

31.4   The use of mobile phones by staff and students is closely monitored by the school, in accordance with the Personal Electronic Devices Policy. Note – is it called this?

31.5   The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what students can be taught regarding online teaching.

31.6   Where students need to learn online from home, the school will support them to do so safely in line with the Student Remote Learning Policy and government guidance.

32.   Mobile phone and camera safety
32.1   Staff members will not use personal mobile phones for personal calls when students are present.

32.2   Staff will use their personal mobile phones to aid, enhance and ensure effective communication is maintained between staff both on the college premises and while attending offsite activities and trips.

32.3   Mobile devices will not be used to take images or videos of students or staff in any circumstances. However staff are permitted to take images of students work, or of them working if they cannot be identified from the image, e.g. their face is hidden/obscured. Staff are to download the images to college machines and delete them from their personal device.

32.4 The sending of inappropriate messages or images from mobile devices is strictly prohibited.

32.5 Staff who do not adhere to this policy will face disciplinary action.

32.6 SMT will review and authorise any downloadable apps – no apps or programmes will be downloaded without express permission from SMT and Grovetech.

32.7 The school will adhere to the terms of the E-Safety Policy at all times.

32.8 Photographs and videos of students will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy.

32.9 The DPO will oversee the planning of any events where photographs and videos will be taken.

32.10 Where photographs and videos will involve LAC students, adopted students, or students for whom there are security concerns, the Acting Head of School will liaise with the DSL to determine the steps involved.

32.11 The DSL will, in known cases of a student who is a LAC or who has been adopted, liaise with the student's social worker, carers or adoptive parents to assess the needs and risks associated with the student.

32.12 The school will adhere to its Photography Policy at all times.

32.13 Staff will report any concerns about another staff member's use of mobile phones to the DSL, following the procedures outlined in the Child Protection and Safeguarding Policy and the Allegations of Abuse Against Staff Policy.

Upskirting

32.14 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.

32.15 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.

32.16 "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

32.17 Upskirting will not be tolerated by the school.

32.18 Any incidents of upskirting will be reported to the DSL who will then decide on the next steps to take, which may include police involvement.

33.   Safer recruitment

33.1 An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

33.2 The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.
Pre-employment checks

33.3 SMT will assess the suitability of prospective employees by:

- Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available.
- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
- Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the TRA Teacher Services' System.
- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.
- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.UK website will be followed.
- If the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.
- Checking professional experience, QTS and qualifications as appropriate using Teacher Services.
- Checking that an individual taking up a management position is not subject to a section 128 direction.

33.4 An enhanced DBS certificate will be obtained from candidates before appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

Internal candidates

33.5   If an individual moves from a position within the school that did not involve the provision of education to one that does, it will be treated as if the individual were a new member of staff and all required pre-appointment checks will be carried out.

33.6   References from internal candidates will always be scrutinised before appointment. Directors

33.7   The College requires enhanced DBS checks on all members of the board of directors.

33.8   Before an individual becomes a Director, the school will carry out an enhanced DBS check and confirm their identity.

33.9   Where a Director also engages in any regulated activity, a barred list check will also be requested.

33.10   An additional check is required for those in management positions, to ensure that they are not prohibited under section 128 provisions. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check.

33.11   If the individual lives or has lived outside of the UK, consideration will be given as to further checks that may be necessary.

33.12   The chair of trustees will complete a suitability check with the ESFA as soon as they are appointed.

33.13   To process a suitability check, the chair of governors will provide the EFSA with:
- Information about their identity verified by a recognised professional, using the EFSA's verification form.
- Information confirming their right to work in the UK.
- The outcome of an enhanced DBS check.
- An overseas criminal records check or certificate of good character if they have lived outside of the UK. I've looked this up online and I think this is the same process that EM completed when the College was set up. The DfE completed checks on him and DSB for opening of Tewks. I can only assume there was a similar process for NCW. It doesn't say anywhere that existing chair people need to complete this. I wonder if Catherine Leighee (no idea how to spell her name) could help with this?

Those who have lived or worked outside of the UK

33.14   For those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.

Barred list check

33.15 An enhanced DBS check may be requested for anyone working in school that is not in regulated activity but does not have a barred list check.

33.16 If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment.

33.17 Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

References

33.18 References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.

33.19 References will only be accepted from a senior person and not from a colleague.

33.20 References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.

33.21 References will be obtained prior to interviews taking place and discussed during interviews.

33.22 Open testimonials will not be considered.

33.23 Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

33.24 Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

Volunteers

33.25 No volunteer will be left unsupervised with a student or allowed to work in regulated activity until the necessary checks have been obtained.

33.26 An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.

33.27 Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.

33.28 A supervised volunteer who regularly teaches or looks after children is not in regulated activity.

33.29 The school will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.

33.30 Unless there is cause for concern, the school will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.

33.31 A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

Contractors

33.32 The school will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.

33.33 Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.

33.34 Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the school.

Data retention

33.35 DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.

33.36 A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

Referral to the DBS

33.37 The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

Ongoing suitability

33.38 Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

34.   Single central record (SCR)

34.1   The school keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school.

34.2   All members of the proprietor body are also recorded on the SCR.

34.3   The following information is recorded on the SCR:
- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A section 128 check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

34.4   The College do not use agency or third party supply staff.

34.5   If any checks have been conducted for volunteers, this will also be recorded on the SCR.

34.6   If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

34.7   The college will record on the SCR whether the employee's position involves relevant activity, i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18.

35.   Training

35.1   Staff members will undergo safeguarding and child protection training at induction, which will be regularly updated on an annual basis or whenever there is a change in legislation.

35.2   The induction training will cover:
- The Child Protection and Safeguarding Policy
- The Behavioural Policy
- The Staff Code of Conduct
- The safeguarding response to children who go missing from education
- The identity of the DSL and any deputies
- The role of the DSL and deputy DSLs

35.3   All staff members will also receive regular safeguarding and child protection updates as required, but at least annually.

35.4   Training will cover, at a minimum:
- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.

- How to keep previously LAC safe.
- Child criminal exploitation and the need to refer cases to the National Referral Mechanism.

35.5 Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

35.6 The DSL and deputy DSL will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.

35.7 The DSL and deputy DSL will also undergo biennial Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff.

35.8 The DSL and their deputy(s) will undergo online safety training to help them recognise the additional risks that students with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support students with SEND to stay safe online

35.9 Online training will also be conducted for all staff members as part of the overall safeguarding approach.

36.   Monitoring and review
36.1 This policy is reviewed annually by the DSL and the Acting Head of School.

36.2 Any changes made to this policy by the Acting Head of School and DSL will be communicated to all members of staff.

36.3 All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

Safeguarding During the Coronavirus (COVID-19) Outbreak

Statement of intent

We understand that we face a time of great uncertainty and, as a school, we are doing all we can to provide clarity and safety to the school community. This appendix includes provisions which the school will have due regard for during the coronavirus pandemic. The information in this section is under constant review and is updated to reflect changes to government and local guidance as it is released.

1.   Key definitions
1.1   For the purpose of this policy, the following definitions will be utilised:
- Children of critical workers: children of parents who work in the following industries:
- Health and social care, e.g. doctors and nurses
- Education and childcare, e.g. teachers and DSLs
- Local and national government, e.g. administrative occupations
- Food and essential goods retail, e.g. supermarket workers and grocers
- Public safety and national security, e.g. police and ministry of defence workers
- Transport, e.g. freight transport workers and train drivers
- Utilities, communication and financial services, e.g. bankers, oil workers, and telecommunications (999 and 111 critical services)
- Vulnerable children: those who have a social worker and those with EHC plans. Those who have a social worker include children who have a child protection plan and those who are looked after by the LA. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

2.   The role of the DSL and their deputies
2.1   In light of the current crisis, the school has additional measures in place to ensure the safety and wellbeing of its students – this approach is led by the DSL.

2.2   As more students return to school, the school makes it a priority to have a trained DSL or their deputy on site. Where possible, this will be the school's DSL or deputy; however, where absence or illness makes this unfeasible, the school will consider the following two options:
- The school's DSL or deputy will be made available via telephone or online communication.
- The school will reach out to NCW or NCT (as appropriate) and they will share a trained DSL or deputy where possible either in person or on video or voice call.

2.3   Where a DSL is unavailable on site, a member of the SLT will take responsibility for coordinating safeguarding within the school. Their role will include:
- Updating and managing access to child protection files via CPOMS.
- Liaising with the offsite DSL or deputy.
- Liaising with children's social care services where required.

2.4   During reopening, the DSL and their deputy are responsible for:
- Sharing their time and resources with NCW or NCT, where necessary.
- Ensuring staff are kept up-to-date with the latest safeguarding information and developments, including via the safeguarding partners, newsletters and professional advice groups.
- Being responsible for amending Appendix A (this section) in line with the continual changes to education policy released by the DfE and communicating all changes to staff and volunteers.
- Working with the VSH and wider LA to protect vulnerable children.

- Providing support to teachers and pastoral staff to ensure that contact is maintained with students, if they are not yet returning to school and their families.
- Ensuring staff are aware of reporting channels for safeguarding concerns.
- Ensuring there is a consistent approach to safeguarding children throughout the coronavirus pandemic.
- Speaking to students directly where possible to identify any concerns and ensuring students are provided with clear communication channels so they can report any concerns they have, including reports of peer-on-peer abuse.
- Providing all volunteers and volunteer staff with copies of this policy.
- Identifying a suitable member of the SLT to assume the role of temporary DSL should both themselves and their deputies become unable to work.
- Sharing their contact information with the school community.
- Identifying vulnerable children and communicating additional safeguarding provisions to students and their families.

2.5   The DSL will report back to the board of directors on all relevant safeguarding concerns.

2.6   The DSL will work with the local safeguarding partners to ensure students remain safe during phased reopening.

2.7   All online or telephone communication will be made using school accounts or telephone numbers. If any staff need to use their personal number, this is withheld. All communications will be recorded on CPOMS.

3.   Attendance
3.1   The school will resume its regular attendance register to record attendance during phased reopening.

3.2   The school will report to the DfE the number of students in school using the online form. This form will be submitted by 12:00pm each weekday.

3.3   Parents will not be penalised if their child does not attend school.

3.4   The school will record and investigate any absences where it expected a child to attend school and did not or where parents have arranged care for their child who subsequently did not attend. Where relevant, the school will report to social workers any student absence.

3.5   The school encourages the attendance of vulnerable students where appropriate, i.e. where there are no shielding concerns for the student or their household, and/or following a risk assessment for students with an EHC plan.

3.6   Individuals who are, or live with someone who is, shielding are not expected to return to school. If a student is, or lives with someone who is, shielding but cannot receive education at home, the school will ensure they can attend in the safest possible way, e.g. by adhering to stringent social distancing measures.

3.7 The school will ensure that all students' emergency contact information is correct and encourage parents to provide as many contact numbers as possible.

4. Staff training and safeguarding induction

4.1 The school will ensure that all existing school staff have read part one of the most up-to-date version 'Keeping children safe in education' (KCSIE) and are suitably trained in this policy and any local safeguarding arrangements.

4.2 The DSL and Acting Head of School will risk assess any volunteers to determine their suitability to work with children.

4.3 Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

4.4 The DSL and Acting Head of School will ensure any volunteers or staff from other schools are suitably trained in safeguarding and ensure that they have read the relevant sections of KCSIE, are aware of the school's safeguarding policy and procedures, and any additional local safeguarding arrangements.

4.5 The DSL and Acting Head of School will use their professional judgement to assess how much additional safeguarding training temporary staff or volunteers require.

4.6 The school will follow safer recruitment processes, in line with the relevant policies, when acquiring new staff.

4.7 New staff or volunteers will continue to be provided with a safeguarding induction and the most up-to-date copy of this policy.

4.8 Existing staff who have not worked in regulated activity during partial school closure will not require a new DBS check; however, the school will carry out a check on anyone who causes a concern.

4.9 All staff will receive updates from the DSL regarding confirmation of local safeguarding processes.

4.10 The school will report anyone to the TRA who they consider a safeguarding risk by emailing Misconduct.Teacher@education.gov.uk – all referrals received by the TRA will continue to be considered but hearings may not be scheduled for the current time.

4.11 Where required, the school will have a rotary system which allows the Acting Head of School to be aware of who will be in school at any one given time.

4.12 The school will ensure the SCR is kept up-to-date in line with KCSIE.

5. Online safety and security

5.1 The school will continue to ensure that appropriate filters and monitoring systems are in place to protect students when they are online on the school's IT systems.

5.2   All online programmes used will be checked by SMT and DSL to ensure they are reputable and GDPR compliant.

5.3   The DSL will report back to the board of directors how they are ensuring students remain safe online during partial school closure.

5.4   Students will report any suspicious online activity they encounter to the DSL or Acting Head of School.

5.5   Staff will adhere to the Staff Code of Conduct at all times when delivering education online.

5.6   Staff will continue to look out for signs of a child being at risk online and report concerns over a student's safety online to the DSL. Where relevant, the DSL will make referrals to the police and children's social care.

5.7   The school will collaborate with parents and carers to reinforce the importance of online safety and encourage parents to set age-appropriate parental controls on digital devices and use internet filters to block malicious websites.

5.8   Students are provided with useful information and contact details of individuals and organisations they can turn to should they feel unsafe online, e.g. Childline or the UK Safer Internet Centre.

6.   Mental health and pastoral care
6.1   The school understands how the coronavirus pandemic can cause students and staff to feel anxious and concerned and will offer any essential support required to those in need.

6.2   The Acting Head of School will encourage contact with isolating staff, one-to-one meetings over the phone or via a video call to ensure they feel supported during this stressful time.

6.3   Students will be provided with different online resources they can access to help them cope with their mental health.

6.4   Face-to-face support will only be provided where two-metre social distancing can be adhered to.

6.5   Teachers will have due regard for the negative impact the current pandemic may have had on students, especially when setting expectations for students' work.

7.   Working from home – if required in the future
7.1   Teachers who have been asked to work from home will plan lessons with the safety of students in mind.

7.2   Staff working from home will find a quiet room with a neutral background if talking to students, parents or carers via video.

7.3   Teachers will ensure that all students accessing online learning sessions will have session set through our dedicated platform SAM Learning and/or through Oak Academy Trust.

7.4   Students will be directed to practical online support, such as Childline, where they feel unsafe and require support outside of school.

7.5   Parents are given a list of websites their child will be accessing and any information of online sessions with staff their child will be participating in during partial school closure.

7.6   Parents are provided with the contact details of the DSL so they can report any concerns they have.

7.7   When communicating online, staff will:
- Communicate within school hours as much as possible.
- Communicate through the school channels approved by SMT.
- Use school email accounts over personal accounts wherever possible.
- Use school devices over personal devices wherever possible.
- Not share personal information.

8.   Peer-on-peer abuse
8.1   The DSL will implement reporting procedures for peer-on-peer abuse during partial school closure and communicate these to all staff, students and parents.

8.2   Reports made regarding peer-on-peer abuse will be risk assessed by the DSL on a case-by-case basis and, where required, investigated immediately and reported to the relevant authority, e.g. the police or CSCS where required.

8.3   Both the alleged perpetrator and victim will be provided with support whilst the report is being investigated.

8.4   Students will be provided with the contact details of relevant bodies who can provide support to them during this time, e.g. Childline.

8.5   The DSL will keep the victim, the alleged perpetrator and their families up-to-date where necessary with details of the investigation, including the conclusion and how appeals can be made.

8.6   Individuals will be given a copy of the school's amended Complaints Procedures Policy to assist them with the appeals process.

8.7   Communications will be made online or by telephone unless face-to-face contact is unavoidable.

9.   Students moving schools
9.1   The DSL will ensure that the receiving school has access to students' EHC plans, child in need plans, child protection plans or, for LAC, their personal education plan and know who the child's social worker (and, for LAC, who the responsible virtual school head is).

10.   Monitoring and review

10.1   SMT are responsible for continually monitoring DfE updates and updating this appendix in line with any government changes and guidance from the local safeguarding partners.

10.2   Any changes to this appendix will be communicated to all staff, parents and relevant stakeholders.

Staff Disqualification Declaration

Name of school:		
Name of staff member:		Position:

Orders and other restrictions	Yes/No
Have any orders or other determinations related to childcare been made in respect of you?	
Have any orders or other determinations related to childcare been made in respect of a child in your care?	
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?	
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?	
Are you barred from working with children by the DBS?	
Are you prohibited from teaching?	

Specified and statutory offences	
Have you ever been cautioned, reprimanded, given a warning for or convicted of:	
• Any offence against or involving a child?	
• Any violent or sexual offence against an adult?	
• Any offence under The Sexual Offences Act 2003?	
• Any other relevant offence?	
Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?	

Provision of information	
If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.	
Details of the order restriction, conviction or caution:	
The date(s) of the above:	
The relevant court(s) or body/bodies):	

You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions/convictions, a DBS Certificate may be provided.

Declaration

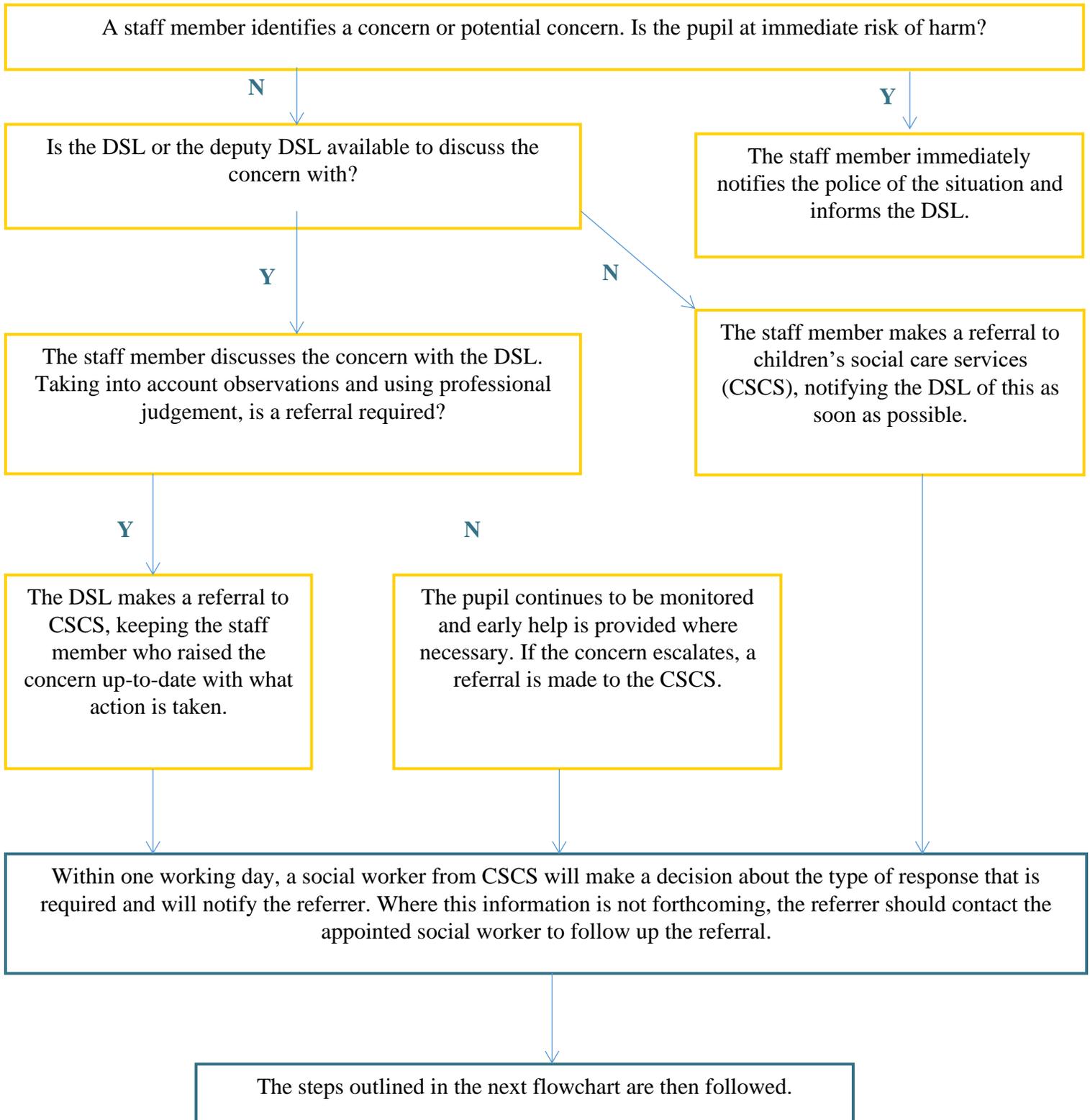| In signing this form, I confirm that the information provided is true to the best of my knowledge and that:	
	• I understand my responsibilities to safeguard children.
	• I understand that I must notify my headteacher immediately of anything that affects my suitability to work within the school. This includes any cautions, warnings, convictions, orders or other determinations made in respect of me that would render me disqualified from working with children.
Signed:	
Print name:	
Date:	

Safeguarding Reporting Process
The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed.
The actions taken by the school are outlined in yellow, whereas actions taken by another agency are outlined in blue.

A staff member identifies a concern or potential concern. Is the pupil at immediate risk of harm?

N

Y

Is the DSL or the deputy DSL available to discuss the concern with?

The staff member immediately notifies the police of the situation and informs the DSL.

Y

N

The staff member discusses the concern with the DSL. Taking into account observations and using professional judgement, is a referral required?

The staff member makes a referral to children's social care services (CSCS), notifying the DSL of this as soon as possible.

Y

N

The DSL makes a referral to CSCS, keeping the staff member who raised the concern up-to-date with what action is taken.

The pupil continues to be monitored and early help is provided where necessary. If the concern escalates, a referral is made to the CSCS.

Within one working day, a social worker from CSCS will make a decision about the type of response that is required and will notify the referrer. Where this information is not forthcoming, the referrer should contact the appointed social worker to follow up the referral.

The steps outlined in the next flowchart are then followed.

Once a referral has been made, a social worker from CSCS will notify the referrer that a decision has been made and one of the following responses will be actioned.

The pupil is in need of immediate protection.

Where the pupil is at risk of significant harm but is not in immediate danger, a strategy discussion is held.

No formal assessment is needed.

Where appropriate to do so, the DSL and staff member who raised the concern may be consulted during these stages to ensure that all areas of concern are addressed.

The DSL supports the initial staff member to liaise with other agencies to arrange an early help assessment and appropriate support.

Appropriate emergency action is taken by the social worker, police or NSPCC.

A Child in Need assessment is completed within 45 working days.

Within 15 working days of the strategy discussion, an initial child protection conference is held.

A child protection plan is potentially required.

The type of support needed is identified, arranged through multi-agency liaison and provided effectively.

Staff keep the pupil's circumstances under review and re-refer if appropriate to ensure circumstances improve – the pupil's best interests always come first.

If the child's situation does not appear to be improving, the DSL should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Contacts and Advice

Expert organisations
Barnardo's
Lucy Faithfull Foundation
NSPCC
Rape Crisis
University of Bedfordshire: Contextual Safeguarding
UK Safer Internet Centre
Support for victims
Anti-Bullying Alliance
MoJ Victim Support
Rape Crisis
The Survivor's Trust
Victim Support
Toolkits
Brook
NSPCC
Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire
Further information on confidentiality and information sharing
Gillick Competency Fraser Guidelines
Government Information Sharing Advice
Information Commissioner's Office: Education
NSPCC: Things to Know and Consider
Further information on sexting
UK Council for Child Internet Safety: Sexting Advice
London Grid for Learning – Collection of Advice
Support for parents
Parentzone
Parentsafe – London Grid for Learning
CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact
CEOP Thinkuknow – Supporting Positive Sexual Behaviour