

# FERNDALE PRIMARY AND NURSERY SCHOOL



## Safeguarding Policy

**Ratified by Governing Body:** Ratified October 2024  
**Reviewed Date:** September 2024  
**Next Review Date:** September 2025

# This is the Safeguarding and Child Protection Policy and Procedures For Ferndale Primary and Nursery School

Page number	Title
3	Quick Reference Contacts Guide
4	Introduction To Safeguarding
<b>Part 1 - Procedures</b>	
4	1.1 What to do if you are worried about a pupil
6	1.2 Working with parents and carers
7	1.3 The Role Of The Designated Safeguarding Lead And Deputy DSL/s In Our School
9	1.4 Next steps - Early Help
10	1.5 Next steps - Making a referral to Children's social care for support at Child In Need or Child Protection level
11	1.6 Case Resolution
12	1.7 Support for pupils
12	1.8 Record-keeping, including transfer of records
13	1.9 Worried About The Actions Of An Adult Who Works/Volunteers With Pupil (including low level concerns)
<b>Part 2 - Specific Safeguarding Themes/issues</b>	
18	2.1 Child On Child Abuse (including:- 2.1.1 Bullying, 2.1.2 Child on Child sexual abuse and 2.1.3 Additional guidance for responding to consensual and non-consensual sharing of nude and semi-nude images)
20	2.2 Sexual abuse
23	2.3 Exploitation and serious crime (including 2.3.1 Child Criminal Exploitation and 2.3.2 Child Sexual Exploitation)
24	2.4 Honour-based abuse, including Female Genital Mutilation
26	2.5 Preventing Radicalisation
28	2.6 Domestic abuse
28	2.7 Neglect
29	2.8 Pupils at greater risk of harm
31	2.9 Behaviour
32	2.10 Attendance
32	2.11 Pupils who are educated off-site
32	2.12 Elective home education
33	2.13 Intimate Care
<b>Part 3 - Policy</b>	
33	3.1 How the policy and procedures are disseminated
34	3.2 How do parents understand school's role in safeguarding pupils
34	3.3 Roles And Responsibilities
34	3.4 Safeguarding Supervision
35	3.5 Use of school premises
35	3.6 Safer Recruitment Procedures
36	3.7 Online Safety
39	3.8 Whistle-blowing
40	3.9 Training For Adults Working In Our School
41	3.10 Record Keeping
<b>Appendices</b>	

41	Appendix 1 – Legislation, Statutory Guidance and Non-Statutory Guidance References
41	Appendix 2 – Definitions Of Abuse
43	Appendix 3 – Safeguarding and Child Protection Concern/Incident Form
46	Appendix 4 – Prompt sheet
47	Appendix 5 – Low level concerns/ allegations incident form template
49	Appendix 6 – Reading requirements
50	Appendix 7 – Identifying support for pupils during partial school closure
53	Appendix 8 –Pupil risk assessment

### Quick Reference Contacts Guide

	Name	
<b>Designated Safeguarding Lead</b>	<b>Rebecca Nolan</b>	<i>01793 332425</i>
<b>Deputy DSL</b>	<b>Lilli Viney (Maternity Leave)</b>	<i>01793 332425</i>
<b>Deputy DSL</b>	<b>Caroline Rouse</b>	<i>01793 332425</i>
<b>Deputy DSL</b>	<b>Tracey Challoner</b>	<i>01793 332425</i>
<b>Deputy DSL</b>	<b>Zoe Miller</b>	<i>01793 332425</i>
<b>Head teacher/ Principal</b>	<b>Rebecca Nolan</b>	<i>01793 332425</i>
<b>Designated Teacher For Children Looked After</b>	<b>Tracey Challoner</b>	<i>01793 332425</i>
<b>Designated Lead for Prevent</b>	<b>Rebecca Nolan</b>	<i>01793 332425</i>
<b>Designated Lead for Filtering and monitoring</b>	<b>Rebecca Nolan</b>	<i>01793 332425</i>
<b>Filtering and monitoring governor</b>	<b>Hannah Walton Kinross</b>	<i>01793 332425</i>
<b>Young Carers Lead</b>	<b>Clare Hobbs</b>	<i>01793 332425</i>

<b>Contact Swindon</b>	<b>01793 464646</b> <b>contactswindon@swindon.gov.uk</b>
<b>Emergency Duty Service</b>	<b>01793 436699</b>

	Name	
<b>Head of school</b>	<b>Rebecca Nolan</b>	<i>01793 332425</i>
<b>Chair of Governors</b>	<b>Rachel Jannaway</b>	<i>01793 332425</i>
<b>Safeguarding Link Governor</b>	<b>Hannah Walton Kinross</b>	<i>01793 332425</i>
<b>Chief Executive Officer (if part of a Trust/Federation)</b>	<b>Gary Evans</b>	<i>01793 332425</i>
<b>Local Authority Designated Officer / Designated Officer For Allegations</b>	The Local Authority Designated Officer (LADO) can be contacted via the Quality Assurance & Review Service, Clarence House, Euclid Street, Swindon SN1 2JH	<b>Tel: (01793) 463854</b>

<b>Police</b>	<b>101 /999</b>
<b>NSPCC Whistle-blowing Helpline</b>	<b>0800 028 0285</b>

## **Introduction - Our School's Commitment To Safeguarding**

This school takes seriously its responsibility to protect, safeguard and promote the welfare of the children and young people in its care.

"The welfare of the pupil is paramount." (Children Act 1989.)

Our staff and governors are committed to safeguarding the pupils at this school and contribute to multi-agency working to keep pupils and students safe.

Working Together To Safeguard Children defines safeguarding as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children;
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

All adults working in our school maintain an attitude of 'it could happen here'. We recognise that staff, because of their contact with and knowledge of children in their care, are well placed to identify abuse, neglect and exploitation and offer support to children in need.

This policy and set of procedures work in line with the relevant legislation, statutory guidance and take account of non- statutory guidance, all of which are listed in Appendix 1

### **Part 1 – Procedures**

#### **1.1 What to do if you are worried about a pupil**

Concerns about a child's welfare can arise in many different contexts; children may be abused in a family, by those known to them. They may be abused by an adult or adults, or another child or children within their family network; this is also referred to as familial abuse.

The risk of harm may come from outside the home (ROTH); this is also referred to as extra-familial harm.

This includes:-

- Exploitation by criminal and organised crime groups or individuals (such as county lines and financial exploitation)
- Serious violence
- Modern slavery and trafficking
- Online harm
- Sexual exploitation
- Teenage relationship abuse
- The influences of extremism, which could lead to radicalisation

Children may experience extra-familial harm from other children and/or from adults; it may take place in school or other educational settings, within community/public spaces and/or online.

You may be worried about a pupil's welfare because you have seen or heard something. You may have noticed a change in their behaviour. You may have seen a mark on a pupil which worries you. You may be concerned about the safety or welfare of a pupil who is absent from school. You may not have received a direct disclosure, but you may have overheard a conversation which worries you.

Where a pupil comes to speak to you directly and tells you information which may suggest they are at risk of abuse, neglect or exploitation, this is known as a disclosure. If a pupil discloses to you, you should:

- **Reassure** the pupil that they being taken seriously and that they will be supported and kept safe
- **Listen** to what the pupil is saying, without displaying any signs of shock or disbelief
- **Allow** the pupil to talk freely without interrupting
- **Reassure** the pupil but do not make promises about keeping the information a secret
- **Reassure** the pupil that this is not their fault
- **Ask** questions only if you need to clarify, take care not to put words in their mouth by asking leading questions
- **Explain** to the pupil that they have done the right thing by telling you and explain what you will do next, in line with the procedures outlined below.

All staff should be aware that children may not feel ready or know how to tell someone they are being abused, and/or they may not recognise their experiences as harmful.

This should not prevent you from having a professional curiosity and speaking to the DSL if you have concerns.

You have a responsibility to follow the steps below:-

#### Step 1

- Do you need to take immediate action to secure the safety of the pupil?
- If you are concerned that a pupil might be in immediate danger or at risk of significant harm you must act **immediately** and before the end of the school day. A decision may need to be taken about whether it is safe for the pupil to return home.
- Report your concerns **directly to a member of the safeguarding team**, as soon as possible. Where possible, this should be done 'face to face'.  
In the first instance our Designated Safeguarding Lead is Rebecca Nolan (01793 332425)  
If the DSL is unavailable, please report to our deputy DSL/s is Lilli Viney/Caroline Rouse/Tracey Challoner/Zoe Miller (01793 332425)
- If no-one from your safeguarding team is available, speak to the most senior member of staff on site. If this is you, please refer to 'Role of DSL'.
- If your concern relates to child on child abuse, refer also to Part 2 of this document and see also Part 5 of Keeping Children Safe In Education.

#### Step 2

- Record your concerns using CPOMS as soon as possible.
- Instructions for logging on can be found at the back of this policy
- Support for logging on can be found via Lilli Viney or Tracey Challoner
- For MDSA's to use the paper concern form and then pass to DSL/DDSL.

### Guidance on recording your concern

- Record the full date and time, location, your name and role and keep your record as factual as possible.
- Use full names, not initials as we need to be able to identify who individuals are.
- Use the pupil's own words where applicable and enclose any direct quotes in quotation marks.
- Include what is it that you have seen/heard/noticed which concerns you?  
Has the pupil communicated that something is wrong? Verbally? Behaviour?
- Ensure your record is clear and factual. If you have included your opinion in your report, have you made it clear that this is your opinion?
- Include why what you have seen/heard/noticed concerns you? What are you worried will happen if this concern/incident is not responded to?
- Is there any context you may be aware of?  
Is this concern the first or have you had other concerns?
- Include any actions you have already taken.
- If marks or injuries have been observed, record these on a body map. (Do not take photographs)
- If a safeguarding/child protection concern/incident form is unavailable, handwritten notes can be made on a piece of paper. (This must be retained, even if the notes are subsequently written up / typed up onto a form).

**Remember that records can be accessed by parents/carers and may also be used in multi-agency meetings and in criminal proceedings. Records should be clear, comprehensive and professionally written.**

### Step 3

- Include whether you have spoken to parents/carers about the concern/incident. Remember, you may need to seek advice from a member of the safeguarding team if you are unsure about whether speaking to the parent may increase the risk to the child. If the parent is the alleged perpetrator you must always seek advice from the safeguarding team before speaking to the parent/carer.
- The original concern form should be passed, in person, to the DSL/Deputy DSL.
- Information should always be kept secure and confidential.
- Copies should not be retained by you.

### Step 4

- You should receive feedback about what action, if any is being taken in response to your concern. A recommended timescale for this is within 24 hours. **If you do not receive feedback or you feel that the situation is not improving for the pupil, you have a duty to follow up your concern with the DSL / deputy DSL.**
- See section on Whistle-blowing also.

Additional consideration needs to be given to pupils with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

### **When Are Parents/Carers Contacted?**

In line with 'Working Together To Safeguard Children', we recognise the importance of working in partnership with parents and carers as far as possible. Whilst collaborative relationships with parents and carers are important, we also recognise that the wishes and feelings of our pupils play a pivotal role in decision-making.

Concerns about the welfare or safety of pupils will be discussed with the parent/carer, unless, having reviewed the information of concern, it is the view of the safeguarding team that this may increase the risk to the pupil. Following consultation with the school's safeguarding team, it may be the pupil's class teacher who makes contact with the parents/carers or it may be a member of the safeguarding team themselves. Our first priority is the pupil's welfare and therefore there may be occasions when concerns about a pupil means that we have to consult other agencies before we contact the parent/carer.

If a referral is to be made to Children's Social Care, the parent/carer will be contacted by a member of the school's safeguarding team and the information within the referral will be shared. There are some occasions when the school will be advised not to share the content of the referral with the parent/ carer as to do so may increase the risk of harm to the pupil.

Where reports are written about pupils as part of the child protection process, the school will provide opportunity prior to the conference to share the content with parents and carers.

## **The Role Of The Designated Safeguarding Lead And Deputy DSL/s In Our School**

The DSL takes responsibility for safeguarding and online safety.

Our Designated Safeguarding Lead is Rebecca Nolan, who works in line with the requirements of the role, as set out in Annex C of Keeping Children Safe In Education.

Our deputy DSL's are Caroline Rouse, Lilli Viney (Maternity Leave), Tracey Challoner and Zoe Miller who are available in the absence of the DSL.

The members of our safeguarding team work in partnership with a range of other agencies, including Local Partners, to keep pupils safe. This includes information-sharing, provision of reports and attendance at multi-agency meetings including child protection conferences and core groups

What happens once a concern /disclosure has been reported to a member of the safeguarding team?

The DSL or deputy DSL will follow the steps below to respond appropriately to the concern and safeguard the pupil:-

### Step 1

- If there is concern that the pupil is in immediate danger contact 'Contact Swindon' on 01793 464646. You may also consider contacting the police on 999. **Go to section 'Making a referral to Social Care' (page 9)**

### Step 2

- Contact the parent/s or carer/s of the pupil concerned, if this has not already been done. You may wish to take advice from Children's Social Care before contacting the parent/carer. If, having sought advice, you believe that sharing this information may increase the risk of harm to the pupil do not share with parents at this stage. You must document your decision-making here if the decision is made not to share information with parents/carers. In the majority of cases informing the parents/carers of the concern / disclosure which has been reported will not increase risk. Ask for any additional information from the parent/carer if applicable.
- Ensure that the parent/carer understands that a record will be kept by the school.

### Step 3

- Refer to the local authority threshold document [https://safeguardingpartnership.swindon.gov.uk/info/15/for\\_professionals/77/multi-agency\\_thresholds\\_document](https://safeguardingpartnership.swindon.gov.uk/info/15/for_professionals/77/multi-agency_thresholds_document) to support decision-making about what action is now required.
- What are the risks to the child? Are they familial; posed by someone in the child's family? Are they extra-familial; posed by adults or peers outside of the home? (See Part 1 of KCSIE for further information)
- If the concern does not require immediate contact with Children's social care consider this latest concern within the context of any wider concerns / disclosures. This may mean further discussion with the pupil's class teacher and /or referring back to safeguarding or child protection records if they exist.

#### Step 4

- Ensure that the member of staff reporting the initial concern has received feedback about actions and outcomes (if applicable).

#### Step 5

- The DSL should keep written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency, such as Children's social care or the prevent programme.

### **1.4 Next steps - Early Help**

*See also Part 1 KCSIE and Working Together To Safeguard Children*

Working Together To Safeguard Children defines early help as:-  
'support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.'

Effective early help relies upon local agencies, including education working together to ;

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a pupil and their family which focuses on activity to significantly improve the outcomes for the pupil.

### **How are children and families identified for Early Help?**

In our school staff are alert to the fact that early signs of abuse and/or neglect can be indicators that support is needed. Any child may benefit from early help, but staff should be particularly alert to a child who:-

- is disabled
- has special educational needs (whether or not they have a statutory education, health and education plan)
- is a young carer
- is bereaved
- is shows signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- is frequently missing/goes missing from education, care or home
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised



- is viewing problematic and/or inappropriate online content (for example linked to violence), or developing inappropriate relationships online
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is mis-using drugs or alcohol themselves
- is suffering from mental ill health
- has returned to family home from care
- is a privately fostered child
- has a parent/carer in custody or is affected by parental offending
- is missing education, or persistently absent from school, or not in receipt of full-time education
- has experienced multiple suspensions, is at risk of being permanently excluded from school and in an alternative provision or pupil referral unit

### What support is provided as part of the school's Early Help offer?

The school has an Inclusion Worker who provides pastoral support for children. The school also has access to the Trust Inclusion Team (Lighthouse) who provide parent support and support for children. The school has breakfast, afterschool and holiday clubs that can be accessed at the head teacher's discretion.

### How does the Early Help process work?

<https://localoffer.swindon.gov.uk/earlyhelpservices>

### 1.5 Next steps - Making A Referral To Children's Social Care For Support At Child In Need or Child Protection level

*See also Part 2 KCSIE and Working Together To Safeguard Children*

- For some children and families early help support may not result in improved outcomes and increased safety for the child involved;
- A family may choose not to engage with the early help process and concerns may escalate as a result;
- The child may be at risk of significant harm.

At this stage, school safeguarding teams should refer to the local authority threshold guidance when making a decision as to whether a referral is made to Children's social care for support for:-

- 1.) a child who is unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired without the provision of services, or the child is disabled – **Child in Need** (under section 17 of the Children Act 1989)

or

- 2.) there is reasonable cause to suspect a child is suffering or likely to suffer significant harm – **Child Protection** (under section 47 of the Children Act 1989)

In the first instance a referral should be made by telephone (01793464646) It is useful to have any safeguarding / child protection records to hand. Following a telephone referral, you will be required to submit a written referral within 24 hours.

Points to consider when completing a referral:-

- Where possible include the 'voice' of the pupil, including any behaviours displayed which may indicate an unmet need.
- Provide a picture of what life is like for the pupil. What is their 'lived experience'?
- Is the risk posed familial or extra-familial? Have you included what else you know about the wider family, environment and context the pupil lives in?
- From the school's perspective, what are your worries for this pupil?
- Are there any safety factors? Are there any times when the school is less worried?
- An early help assessment is not a prerequisite for a referral but where one has been undertaken it should be used if a referral is made to children's social care.
- There are a number of additional 'frameworks' which can also be considered at this stage e.g. [the Hackett Continuum](#), the Brook Tool, Neglect Framework, Graded Care Profile

The completed referral will be shared with parents/carers, who will be asked to provide consent to the information being shared with social care. If consent is not given, or the referrer deems that it would place the pupil at risk to share the referral prior to reporting to social care, the information can still be shared where there is good reason to do so.

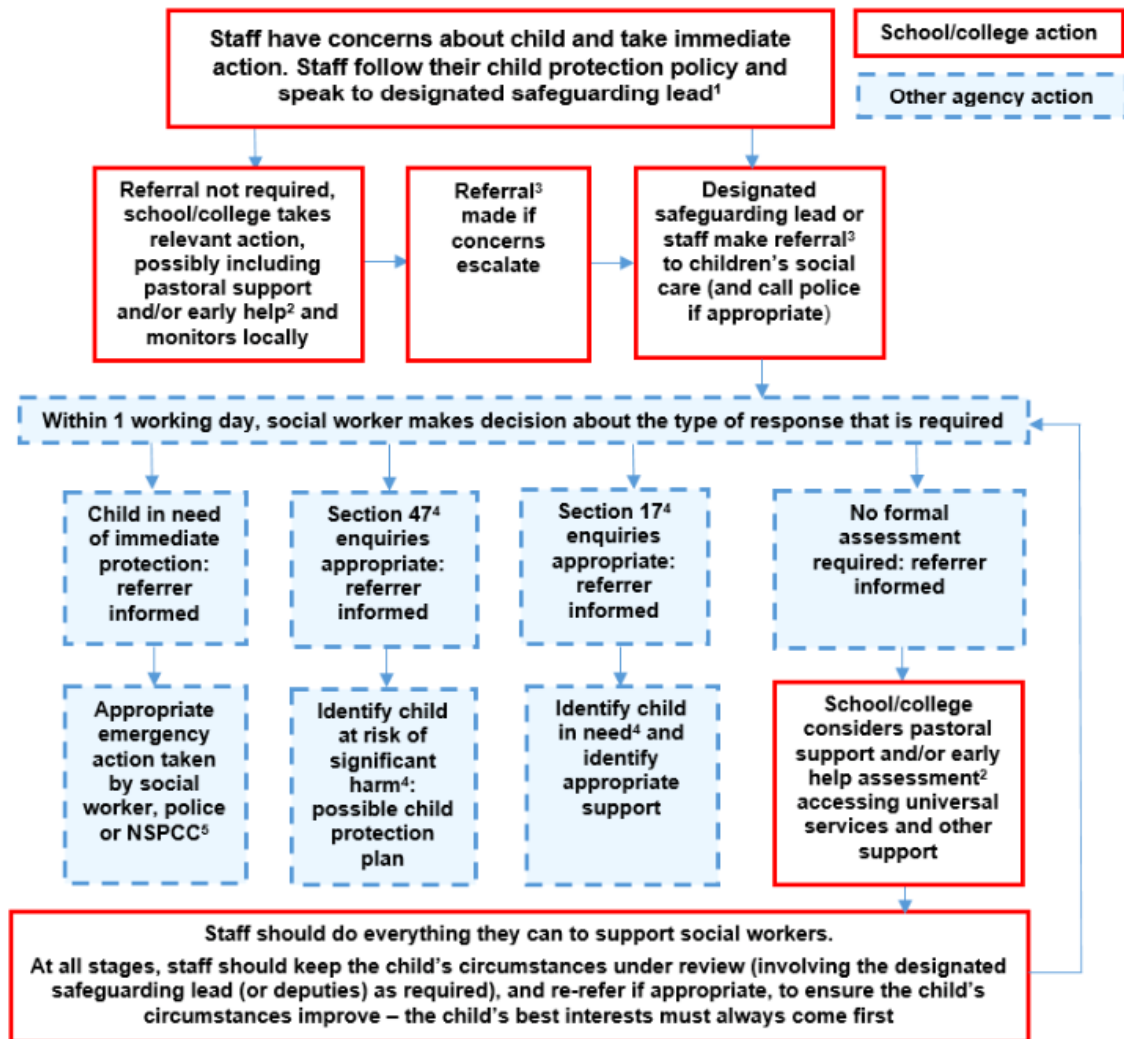
### **Outcome of referral**

Members of the school's safeguarding team work in line with the statutory guidance included in Chapter 3 of 'Working Together To Safeguard Children' and the local multi-agency safeguarding procedures, which outline next steps and decision-making following a referral to Children's social care.

Whenever there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, a strategy discussion should take place involving Children's social care, the police and health. The school should also be represented at this meeting.

*See flowchart below and Working Together To Safeguard Children*

## Actions where there are concerns about a child



Flowchart taken from 'Keeping Children Safe In Education'

### 1.6 Case resolution

#### In school

- If a member of staff does not see any improvement having reported a concern about a pupil, they have a duty to re-report to a member of the safeguarding team.
- If it is felt that the safeguarding team is not taking their concern seriously then this must be escalated to the Head teacher or the Chair of Governors (if the Head teacher is a member of the safeguarding team). See also section 'Whistle-blowing'.

#### External

- If a member of the safeguarding team feels a decision made by another professional in another agency is not in the pupil's best interests, they must discuss this further. In the first instance, this takes place directly with the professional involved to allow opportunity for decision-making to be discussed and clarified. (Pre-escalation)
- If pre-escalation fails to resolve the issues identified, the member of the safeguarding team should escalate within their own organisation (to the Head teacher if they are

not in this role). The issue is then escalated to the professional's line-manager. (Escalation/Case Resolution)

- At all stages records should be kept.
- The Head teacher will ensure that the intention to instigate case resolution procedures is made explicit and in writing.

### **1.7 Support For The Pupil**

Staff are in a position to identify concerns early, provide help for pupils, promote pupils' welfare and prevent concerns from escalating. Training is provided for staff to ensure they have an understanding of how children's experiences can impact on their mental health, behaviour, attendance and progress in school.

To promote pupils' welfare we provide the following support:-

**We will allocate a member of our Inclusion Team to act as a contact and support the child.**

### **1.8 Record-keeping**

Any member of staff, visitor or volunteer who has a concern about a pupil's welfare or receives a disclosure of abuse will make an accurate record, **as soon as possible**, noting what was said or seen, putting the event into context and giving the full date, time and location. Where possible this will be noted on CPoms.

If injuries or marks have been observed which cause concern, these should be recorded on a body map outline, giving an indication of size and whether there is a defined shape to the mark or injury.

Photographs should not be taken.

Any handwritten notes (not captured on the safeguarding and child protection concern/incident form) will be retained, even if they are subsequently written up.

### **Chronologies**

Individual pupil chronologies will be kept up to date and reviewed at regular intervals. All 'significant events' are captured on this chronology, including attendance at meetings, phone calls and emails in relation to safeguarding and /or child protection matters. This chronology also captures headline information about what action has been taken and the outcome of this action. The outcome should focus, where possible, on the pupil and indicate whether the situation is improving.

### **Case file review**

Safeguarding and child protection files for individual pupils should be re-visited regularly to ensure any risk is being reduced and appropriate taken. It is good practice for this review to take place on a termly basis.

To ensure that all files are reviewed an overview of all pupils (where there are safeguarding / child protection concerns) is kept up to date. This is a 'live' document and reflects the numbers of pupil's subject to child protection, child in need or receiving early help support.

### **Transfer of records when a pupil moves to a new school**

When a pupil moves school, safeguarding / child protection original documentation will be passed as soon as possible and confidentially to the receiving school, separate from academic records. Where possible, the DSL will arrange to meet the DSL of the new school to discuss the documentation. The receiving school is asked to sign to confirm receipt of the information and this confirmation is stored on file.

## **Record Retention**

The school will retain records for pupils:-

- who have been withdrawn to be home-schooled, if there is an existing safeguarding /child protection file.
- Where they are the last educational provider for the pupil

All records are stored in line with the school's Records Management Policy

Further guidance on the retention of records can also be found at

<https://irms.org.uk/page/SchoolsToolkit>

## **1.9 Worried About The Actions Of An Adult Who Works/Volunteers With Children**

*See also Part 4 KCSIE*

You may be worried about the actions of an adult who is working/volunteering with children.

The adult may be :-

- an employee of the school
- a supply teacher
- an adult working with the school, employed by a third party (including staff working in alternative and enhanced provision and contractors) after school club and lettings.
- a volunteer

You may have seen or heard something which makes you feel uncomfortable.

You may be concerned that the adult's actions are contravening the school's staff code of conduct. <https://bluekitetrust.org.uk/wp-content/uploads/2022/06/BKAT-Staff-Code-of-Conduct>

You may be aware of a situation the adult is involved in, outside of school, which suggests they may not be safe to work/volunteer with children and young people.

All concerns must be reported following the steps below:-

### Step 1

- If you are concerned that a child might be in immediate danger or at risk of significant harm you must act immediately. Do you need to take immediate action to secure the safety of the pupil?
- Report your concerns directly to the Head of school as soon as possible. Rebecca Nolan (01793 332425)
- If the Head of school is not contactable, report to the most senior member of staff on site.
- If your concerns are about the Head of school report to the CEO, Gary Evans (01793 332425) directly.

### Step 2

- Record your concerns using the school's 'Concern/Disclosure' form (see Appendix 5), as soon as possible. These forms can be found in the staffroom and on the V drive

- **Staff should NOT record allegations or concerns about adults working or volunteering with pupils on electronic pupil record systems.**
- Remember to record the full date and time, your name and role and keep your record as factual as possible.
- If a concern/disclosure form is unavailable, handwritten notes can be made on a piece of paper. (This must be retained, even if the notes are subsequently written up onto a form).

### Step 3

- Record what action you are taking, for example record the name of the member of staff you have reported to.
- The original concern form should be passed to the Head teacher or the CEO, if the concern/allegation involves the Head teacher. Copies should not be retained by you.
- If the person you have reported the concern to does not take your concern seriously, you must escalate your concern to the CEO. Ultimately anyone can report a safeguarding concern about an adult working with children into the local authority, asking to speak to the Local Authority Designated Officer (LADO) See Quick Reference Contact Guide on page 2.
- The CEO is informed of low-level concerns using the same protocol for concerns being reported.

### **The Role of the Head teacher and CEO when dealing with low level concerns or allegations involving adults who work/volunteer with children**

- The Head teacher and CEO will consider the information in the report and initial consideration will be given as to whether this indicates that the person would pose a risk of harm if they continue to work in close or regular contact with children in their present position or in any capacity.

Is there evidence to suggest that the harms threshold has been met:-

- the person has behaved in a way that has harmed a child, or may have harmed a child;
- the person has possibly committed a criminal offence against or related to a child; or
- the person has behaved towards a child or children in a way that indicates that he/she **may** pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

*Criteria listed above taken from Part 4 of 'Keeping Children Safe In Education'*

### **Allegations that meet the harms threshold**

If initial information in the report suggests that the threshold has been met, the Head teacher or CEO will follow Section 1 of Part 4 of KCSIE - 'Allegations that meet the harms threshold.

Where the allegation relates to an adult externally employed/contracted, the Head or CEO will inform the employer of the allegation.

### Step 1

- The Head teacher or CEO will contact the LADO/DOFA immediately, before commencing any form of investigation. Schools are permitted to conduct basic enquiries, (see page 83 of KCSIE) to establish the facts, however care should be taken not to jeopardise any future police investigation.

## Step 2

The LADO will decide on further action:-

- strategy discussion/meeting, or
- advice and follow up from LADO, or
- no further action by the LADO after initial consideration and closure

If further action is agreed, the LADO will agree with the police whether or not a strategy discussion/ meeting needs to take place. If it is agreed that the threshold has not been met for a strategy discussion/meeting, an allegations management meeting may be held. The main purpose of this is to ensure the safety of the children and ensure the process is concluded promptly, ensuring the accused staff member has adequate support.

At the conclusion of investigations, an outcome will be agreed by the LADO:-

- Substantiated: there is sufficient evidence to prove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- False: there is sufficient evidence to disprove the allegation
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

A record of the outcome of all allegations involving the LADO is held.

At the end of the allegation process if a member of staff or volunteer is removed from their position for causing harm or posing a risk of harm or they leave whilst investigations are on-going, the school has a duty to inform the Disclosure and Barring Service via a referral.

Where a decision is made to dismiss or cease to use **the services of a teacher** because of serious misconduct, or they might have been dismissed or their services ceased had they not left first, the school will consider whether to refer to the Teaching Regulations Agency.

We understand, as a school, that if we know or have reason to believe that an individual is barred, we are committing an offence if we allow the individual to carry out any form of regulated activity.

### **Concerns that do not meet the harm threshold**

Creating an environment with a strong culture of safeguarding , where pupils are kept safe involves ensuring that **all** concerns about adults who work/volunteer with children are shared responsibly, with the right person, recorded and dealt with appropriately.

A low-level concern may be a sense of unease, a nagging doubt, or noticing that an adult appears to be contravening the school's staff /visitor code of conduct. It may include 'over-friendliness with a pupil/pupils, having a favourite pupil, engaging with a pupil on a one to one basis in a secluded area of the school.

Staff, volunteers and external visitors must share **all concerns which arise**, even if they do not believe the harm threshold has been met. Just because a concern does not meet the harm threshold does **not** mean it is insignificant.

### Possible actions

- The Head teacher/ /CEO may still consider contacting the LADO for further guidance if required.
- The Head teacher/ /CEO will consider what action needs to be taken to address the low level concern/s, which may include additional staff training, mentoring and/or a verbal or written warning. Advice may be sought from the school's HR provider here.
- It is important that all low-level concerns are recorded, to identify whether a pattern of worrying behaviour is emerging. This chronology of concerns may trigger a referral into the LADO where a pattern emerges.

### Code of conduct

Staff, volunteers and external visitors are provided with our school's code of conduct and sign to confirm that they have read and understand expectations about their behaviour. Ensuring that this process is followed robustly helps keep children safe.

Unprofessional behaviour which breaches our staff code of conduct is addressed at an early stage and the individual supported.

### **Supporting the welfare of the child**

Where a child has been harmed, there is immediate risk of harm or the situation is an emergency contact will be made with Children's Social Care and as appropriate the Police.

As a school we will support pupils as outlined on Page 9

### **Supporting the welfare of the adult at the centre of the concern/allegation**

Employers have a duty of care for their employees. The Head teacher/CEO must put in place support for the adult at the centre of the concern/allegation.

Employers have a duty of care to their employees. They should:

- manage and minimise the stress caused by the allegation
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary
- advise the individual to contact their trade union representative, or a colleague for support
- appoint a named representative to keep the person informed about the progress of the case
- provide access to counselling or medical advice where appropriate. For staff in schools maintained by the local authority this may include support via the local authority's occupational health arrangements, and,
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

### **Record-keeping**

All low level concerns and allegations about adults who are working or volunteering with children should be recorded on the school's 'Concerns / Allegations Record For Adults working or volunteering with children/young people' (see Appendix 5).

Records are stored confidentially and securely and comply with the data Protection Act 2018 and the UK GDPR Act.

### **Allegations which meet the threshold**

The following information is kept on file:-

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up



- Details of action taken, decisions reached and the final outcome
- A declaration on whether the information will be referred to in any future reference

Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry Into Child Sexual Abuse (IICSA) for the term of the enquiry. All other records should be retained at least until the accused has reached normal pension age or a period of 10 years from the date of the allegation if that is longer.

Further information can be found on the [ICO website](#).

### **Low level concerns**

The following information should be recorded:-

- Details of the concern and the context in which the concern arose
- Action taken
- If advice was taken as to whether the LADO was contacted for guidance

This information is retained until the individual leaves employment/volunteering role with the school.

Where a pattern of concerns emerges, these are recorded on a chronology. These are reviewed to decide whether the pattern of behaviour moves to concern to meeting the harms threshold, in which case it will be referred to the LADO.

### **Following an allegation or low-level concern**

Consideration will be given as to whether there are areas of the schools safeguarding practice and procedure or wider cultural issues within the school which need addressing following an allegation or low-level concern. Where appropriate, policies will be revised or additional training provided to minimise the risk of this happening again.

## **Part 2 - Specific Safeguarding Themes**

*See also Annex B KCSIE*

Knowing what to look for is vital for the early identification of abuse, neglect and specific safeguarding issues such as exploitation.

If you are at all unsure you should **always** speak to the safeguarding team.

### **2.1 Child On Child Abuse**

*See also Part 5 KCSIE and Annex B*

We recognise that children are capable of abusing other children. This can happen both inside and outside of school and online. A child may not find it easy to report child on child abuse and we recognise that they might show signs or act in ways that they hope an adult will notice, including a change in behaviour. Even if there are no reported cases of child on child abuse, we recognise that abuse may still be taking place but not being reported. We understand that the pupil who is perpetrating the abuse may also be at risk of harm and we will make every effort to ensure that the perpetrator is supported appropriately.

### **Procedures in place to minimise the risk**

- The school's ethos encourages pupils to raise concerns with staff, knowing that they will be listened to, believed and valued. The school's ethos encourages pupils to raise concerns with staff, knowing that they will be listened to, believed and valued.

Displays and posters around school support children in knowing who they can talk to. There is a check in system in each classroom. Children are signposted to helplines such as Childline.

- Systems are in place for pupils to confidently report abuse, knowing their concerns will be taken seriously.
- We deliver a Relationships Education and Health Education (Primary) / Relationships and Sex Education and Health Education (Secondary) curriculum in line with the DfE statutory guidance. This develops pupils' understanding of healthy relationships, acceptable behaviour and keeping themselves safe. This curriculum is broad, balanced and covers a range of safeguarding themes. It is progressive across the year groups. We follow the Jigsaw program that includes the following themes:-

Term 1 - Being Me in My World

Term 2 - Celebrating Difference

Term 3 - Dreams and Goals

Term 4 - Healthy Me

Term 5 - Relationships

Term 6 - Changing Me

- Staff receive regular training to ensure they know signs and indicators which may suggest a pupil is at risk of child on child abuse and understand their role and responsibilities to report to the safeguarding team as soon as possible.
- Our school has a zero-tolerance approach to abuse and regular staff training ensures that incidents of child on child abuse are never passed off as 'banter', part of growing up or 'boys being boys'. All incidents of child on child abuse are reported to the safeguarding team.
- The school has a behaviour policy in place which is regularly reviewed and sets out the expectations about appropriate behaviour. Our policy makes clear that child on child is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Following an incident where sexually harmful behaviour has been identified, the safeguarding team will ensure that risk to siblings is considered.

Set out below are the different types of child on child abuse and the systems in place to respond to these.

### **1. Bullying (including Cyberbullying)**

There is no legal definition of bullying. However, it's usually defined as behaviour that is:

- Repeated (although not always)
- intended to hurt someone either physically or emotionally
- often aimed at certain groups, for example because of race, religion, gender or sexual orientation

This can include:

- physical assault
- teasing
- making threats
- name calling

- cyberbullying - bullying via mobile phone or online (for example via email, social networks and chat rooms on gaming platforms)
- racist and religious bullying: A range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, culture, faith community, national origin or national status;
- sexual, sexist and transphobic bullying: includes any behaviour, whether physical or non-physical, where sexuality is used as a weapon by boys or girls;
- homophobic bullying: targets someone because of their sexual orientation (or perceived sexual orientation);
- disablist bullying: targets a young person based on their disability, special needs or health needs. This can include manipulative bullying where a perpetrator forces the victim to act in a certain way or exploiting a certain aspect of the victim's disability.

### **Responding to concerns about bullying**

Pupils who attend our school have the right to learn in safety. We do not tolerate bullying of any kind and will challenge derogatory language and behaviour towards others, whether this is an isolated incident or a pattern of behaviours.

## **2. Child on Child Sexual abuse**

*See part 5 of KCSIE*

This can include:-

- Sexual violence and sexual harassment - Sexual violence and sexual harassment can occur between two pupils of **any age and sex**, from Primary, into Secondary and into College. **We recognise that 'it could happen here'**. It can occur through a group of pupils sexually assaulting or sexually harassing a single pupil or group of pupils. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and 'face to face' (both physically and verbally) and are never acceptable.

Sexual violence can include:-

- Rape
- Assault by penetration
- Sexual Assault

Sexual harassment can include:-

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names
- Sexual 'jokes' or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature
- Inappropriate/unwanted touching
- Consensual and non-consensual sharing of nude and semi-nude images, videos and/or livestreams (also known as sexting or youth produced sexual imagery)
- Up-skirting

Child on child sexual abuse can also include:-

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Initiation/hazing - refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group

## **Responding to concerns about child on child sexual abuse**

### Step 1

- Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted upon).

### Step 2

- **Record** the incident using the school's safeguarding recording procedures and **report** to the DSL / deputy in line with safeguarding and child protection procedures, as soon as possible. Is information about the incident first hand or do other individuals need to be spoken to, to confirm?

### Step 3

The DSL will consider the following:-

1. The wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and support they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children. A victim should never be given the impression that they are creating a problem, nor should they be made to feel ashamed for making a report. It will be explained that the law is in place to protect children/young people rather than criminalise them.
2. Has a criminal offence been committed? If yes, contact the police (See also **'When To call the Police'** (NPCC)).
3. Ages of pupils / developmental stage
4. Whether there is a power imbalance between the children
5. Whether the alleged incident is a one off incident or there is a sustained pattern
6. Any on-going risks to the victim, other children, or staff.
7. Other related issues and the wider context, including whether there is evidence of the victim/s being exploited, criminally and/or sexually

To support our judgements about sexualised behaviours we refer to [the Hackett Continuum](#) and/or ['Brook Sexual Behaviours Traffic Light Tool'](#).

### Step 4

- If there is no evidence to suggest that a criminal offence has taken place the DSL will consider next steps, in discussion with parents/carers unless to do so would increase the risk to the pupils involved.
- If there is evidence to suggest that a criminal offence has taken place the DSL will follow the guidance in part 5 of KCSIE. Any report to the police will be in parallel with a referral to contact Swindon.

This will typically involve:-

1. Considering support, including Early Help support for both the victim and perpetrator (does the perpetrator have unmet needs?)
2. Making a referral to Contact Swindon if the victim has been harmed, or is at risk of harm.
3. Making a referral to Contact Swindon if the perpetrator is at risk of harm / being harmed (under-lying welfare and safety concerns which may have triggered behaviours).
4. Writing a risk assessment for pupils, who have been identified as being at increased risk of child on child abuse (considered for both the pupil perpetrating the abuse and the pupil who is the victim) to include protection and support. See Appendix 8 for template
5. Considering targeted education about healthy relations for the perpetrator and any additional sanctions under the school's behaviour policy.

### **2.1.3 Additional guidance for responding to consensual and non-consensual sharing of nude and semi-nude images, videos and/or livestreams**

#### Step 1

- Report to your DSL immediately.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

*Taken from [UKCIS guidance](#)*

#### Step 2

- The DSL will hold an initial review meeting with appropriate staff. This may include the staff member who was initially made aware of the incident/concern and the leadership team.

The following risk factors will be considered:-

1. Significant age difference between the sender/receiver involved
2. If staff recognise the pupil as more vulnerable than is usual (ie at risk)
3. If the image is of a severe or extreme nature

4. If the situation is not isolated and the image has been more widely distributed
5. If this is not the first time the pupil has been involved in a sexting act
6. If other knowledge of either the sender/recipient may add cause for concern (ie difficult home circumstances)

### Step 3

- A referral will be made to Contact Swindon and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process.

### Step 4

- Interviews will take place with those involved.

### Step 5

- Parents/carers should be informed at an early stage and involved in the process in order to best support the child or young person, unless there is good reason to believe that involving them would put the child or young person at risk.

### Step 6

- Safeguarding records will be updated using the school's safeguarding recording procedures, including actions taken / not taken and the justification for these decisions (linked to the points above).

## **2.2 Sexual Abuse (perpetrated by an adult or adults)**

“Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.” *Working Together To Safeguard Children*

### **Signs and indicators of sexual abuse**

- Physical signs e.g. bruising, pain or soreness in the genital area
- Being afraid /avoiding a particular person
- Being withdrawn
- Self-harming
- Episodes of going missing
- Eating disorders
- Displaying sexualised behaviour or having sexual knowledge that's inappropriate for their age and stage of development.

Grooming is a process that involves the perpetrator building a trusted relationship with the child or children. Children can be groomed by a stranger or someone they know, for example a family member (intra-familial sexual abuse), friend or professional (extra-familial sexual abuse). Grooming techniques can be used to prepare a child for sexual abuse and

exploitation (see also section 2.3 below) grooming can also be used to radicalise a child – (see also section 2.5 below)

## **Responding to concerns of sexual abuse**

### Step 1

- Immediate consideration should be given as to how best to support and protect the victim (and any other children impacted upon, including siblings)

### Step 2

- **Record** the incident using the school's safeguarding recording procedures and **report** to the DSL / deputy in line with safeguarding and child protection procedures, as soon as possible.

The DSL will make a referral to Children's social care.

## **22.3 Exploitation and Serious Violent Crime**

See also [Part 1](#) and [Annex B KCSIE](#) and the [County Lines toolkit](#)

This school recognises that children can be exploited sexually (CSE) or criminally (CCE). CSE and CCE can affect children, both male and female and can involve children who have been trafficked. They may be at risk of or involved in serious violent crime.

### **2.3.1 Child Criminal Exploitation**

Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

#### The following can be indicators of CCE:-

- Unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Changes in emotional well-being
- Misuse of drugs and alcohol
- Periods of time missing or regularly coming home late
- Children who regularly miss school or education or do not take part in education
- Carrying knives or weapons for a sense of protection from harm from others

CCE can include children being forced to shoplift or pickpocket, forced to threaten other young people, forced to work in cannabis factories, being coerced into moving drugs or money around the local area or across counties (County Lines).

Risk factors which increase the likelihood of involvement in serious violence, include:-

- Being male

- Having been frequently absent or permanently from school
- Having experienced child maltreatment
- Involvement in offending such as theft

### 2.3.2 Child Sexual Exploitation

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

The above CCE indicators can also be indicators of CSE, as can:

- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge eg through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited and believe they are in a genuine, romantic relationship.

#### **Responding to concerns that a pupil might be being exploited**

Our safeguarding procedures will be followed here, and a referral made to social care as appropriate (including support, if applicable, for the pupil who is deemed to be 'perpetrating' the abuse.)

*See also section above on child on child abuse and 'When To call the Police' (NPCC)*

### **2.4 Honour-based abuse, including Female Genital Mutilation**

*See also Annex B KCSIE, <https://www.gov.uk/guidance/forced-marriage> and [multi-agency statutory guidance on Forced Marriage](#)*

Honour-based abuse encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast-ironing.

#### **Responding to concerns about honour-based abuse**

Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can involve multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what action to take.

Our safeguarding procedures will be followed here and staff should speak to a member of the safeguarding team immediately if they suspect a child or young person is at risk of



honour-based abuse. Safeguarding teams will contact children's social care/ adults social care for anyone 18 or above and local protocols will be followed.

### **Female Genital Mutilation (FGM)**

See Annex B, [Multi-agency statutory guidance on FGM](#) and [FGM factsheet](#)

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. This practice is often referred to as 'cutting'.

It is frequently a very traumatic and violent act for the victim and can cause harm in many ways.

The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

#### Key points

- FGM is illegal in the UK. It is also illegal to take a British National or permanent resident abroad to undergo FGM or help someone who is trying to arrange to have FGM performed.
- FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.
- FGM is prevalent in 30 countries. These are concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East, and in some countries in Asia.
- FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. This practice is not required by any religion.

#### Risk Factors

The most significant factor to consider when deciding whether a girl or woman may be at risk of FGM is whether her family has a history of practising FGM.

In addition, it is important to consider whether FGM is known to be practised in her community or country of origin. It is important not to make assumptions that all girls from these communities are at risk.

A parent may request permission for their child to travel overseas for an extended period. This is sometimes requested leading into or out of a school holiday (often the summer break).

### **Responding to concerns about Female Genital Mutilation**

If a girl has disclosed to you that she has been subjected to FGM or you have visual evidence of this, you must report it to the police.

(Teachers are required to report known cases of FGM in girls under 18 to the police under the mandatory reporting duty October 2015)

If a direct disclosure has not been made and there is no visual evidence, but you have concerns that the pupil may have been subject to or at risk of FGM the school's normal safeguarding procedures will be followed here.

This includes reporting your concerns to a member of the safeguarding team and putting your concerns in writing.

The DSL will follow the steps below to respond appropriately to the concern and safeguard the pupil:-

#### Step 1

- Consider the information of concern. This may mean referring back to check whether there is any previous information of concern for the pupil.

#### Step 2

- Check whether there are any risk factors present for the pupil / family

#### Step 3

- Where it is deemed appropriate to do so, speak to the parent or carer about FGM. Be sensitive to language differences.

#### Step 4

- At this stage consideration should be given to make a referral to Children's Social Care. It is useful to have any safeguarding / child protection records to hand. Following a telephone referral, you will be required to submit a written referral within 24 hours.

See also:

FGM Helpline: 08000283550

Email: [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

Home Office Resource Pack - <http://www.gov.uk/government/publications/female-genital-mutilation-resource-pack>

## **2.5 Preventing Radicalisation**

See also Annex B KCSIE , [The Prevent Duty Guidance](#) and [The Prevent Duty: an introduction for those with safeguarding responsibilities](#)

The Home Office Prevent Duty guidance defines radicalisation as ‘the process of legitimising support for, or use of terrorist violence.’ An individuals’ susceptibility to radicalisation may be linked to their vulnerability. An individual can be vulnerable if they need special care, support or protection because of age, disability, or risk of abuse and/or neglect.

The following can be indicators of risk:-

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- advocating violence towards others

As a school we recognise that we have an important part to play in educating children about extremism and recognising when pupils start to become radicalised. In our school the

designated lead responsible for the delivery of Prevent is *Rebecca Nolan*. The designated lead works in line with the statutory requirements laid out in the Prevent Duty guidance.

A school Prevent risk assessment is in place and is reviewed at least annually by the designated lead. This assesses how pupils and staff may be at risk of being radicalised into terrorism, including online. Where specific risks are identified an action plan is developed to mitigate the risk.

We ensure that through our school vision, values, rules, curriculum and teaching:-

- we limit exposure to radicalising narratives, both online and offline, including our work in line with the Filtering and Monitoring Standards.
- we promote tolerance and respect for all cultures, faiths and lifestyles.
- the governing body also ensures that this ethos is reflected and implemented effectively in school policy and practice.
- pupils who attend our school have the right to learn in safety. We do not tolerate bullying of any kind and will challenge derogatory language and behaviour towards others.
- visitors who are invited to speak to pupils will be informed about our ethos and safeguarding procedures and relevant vetting checks are undertaken. We undertake due diligence to ensure that visiting speakers are appropriate. Speakers will be supervised at all times and will not be allowed to speak to children without a member of staff being present.

### **Responding to concerns that a pupil might be at risk of radicalisation**

Local procedures for reporting concerns about possible radicalisation will be followed here – [https://safeguardingpartnership.swindon.gov.uk/info/3/workers\\_and\\_volunteers/10/workers\\_and\\_volunteers/14](https://safeguardingpartnership.swindon.gov.uk/info/3/workers_and_volunteers/10/workers_and_volunteers/14)

In addition, the DSL / deputy DSL may consider making a referral to the local authority Channel Panel (seek advice from Children's Social Care)  
Channel is a multi-agency approach to provide support to individuals who are susceptible to being drawn into terrorist related activity.

Each local authority has a panel and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be susceptible to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

Referrals to Channel require the individual's consent.

The DfE helpline can be contacted for advice 020 7340 7264 (this should not be used in cases of emergency)  
or via the e mail [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

### **2.6 Domestic Abuse**

'Abusive behaviour' is defined in the Domestic Abuse Act (2021) as any of the following:

- physical or sexual abuse

- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse

For the definition to apply, both parties must be aged 16 or over and 'personally connected'.

It can encompass a wide range of behaviours and may be a single incident or a pattern of behaviours. The impact of domestic abuse on children and young people is detrimental and long term and can affect their health, well-being and ability to learn. Children and young people may see, hear or experience the effects of abuse.

### **Responding to concerns that a pupil might be subject to or witnessing domestic abuse**

Our safeguarding procedures will be followed here, and a referral made to social care as appropriate.

Reports of domestic abuse involving/affecting children who attend Ferndale Primary and Nursery School will be sent to the school securely using Operation Encompass. These records will be held by the school as part of children's safeguarding records.

### **2.7 Neglect**

Working Together To Safeguard Children defines neglect as :-

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.
- provide suitable education
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

#### **The following can be indicators of risk:-**

The following is a summary of some of the indicators that may suggest a child is at risk of or being neglected:-

#### **Physical indicators of neglect**

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

### Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

[https://safeguardingpartnership.swindon.gov.uk/info/3/workers\\_and\\_volunteers/10/workers\\_and\\_volunteers/12](https://safeguardingpartnership.swindon.gov.uk/info/3/workers_and_volunteers/10/workers_and_volunteers/12)

<https://learning.nspcc.org.uk/research-resources/2022/graded-care-profile-2-case-study-evaluation>

## **2.8 Pupils at greater risk of harm**

### **2.8.1 Pupils with disabilities, special educational needs (SEN) or certain health conditions**

As a school, we recognise that pupils who have disabilities, SEN or certain health conditions can face additional safeguarding and child protection challenges.

These can include:-

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's disability, SEN or health condition/s without further exploration
- pupils can be disproportionately impacted upon by things like bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers

### **2.8.2 Pupils who need a social worker (including Children In Need, Children on a Child Protection Plan and Children Looked After)**

Children may need a social worker due to safeguarding or welfare needs. They may need this help due to abuse, neglect and complex family circumstances. A child's experience of trauma and adversity can leave them vulnerable to further harm, as well as educationally disadvantaged, facing barriers to:-

- attendance
- learning
- behaviour
- mental health

As a school we ensure that all staff working directly with children/young people have a knowledge and understanding of the impact of adversity and trauma on children's mental and physical health, development and life chances. We understand that children can communicate an unmet need through their behaviour, whether this is challenging and disruptive or quiet and withdrawn. **Our school behaviour policy reflects this and includes the ways in which we respond in these situations.**

Teaching staff are supported by the members of the safeguarding team to maintain high aspirations for these children, identifying the challenges these children may face and making adjustments to teaching and learning to best support them.

The designated teacher for looked after children and previously looked after children is Tracey Challoner. The school staff work with multi-agency professionals, including the Local Authority Virtual Schools Head, to ensure that prompt action is taken when necessary to safeguard these children. We recognise these children are a particularly vulnerable group.

Appropriate staff are provided with information in relation to their legal status and contact arrangements, as well as information about the child's care arrangements.

### **Pupils who are lesbian, gay, bi-sexual or transgender (LGBT)**

As a school we recognise that whilst being LGBT is not in itself an inherent risk factor for harm, children who are LGBT can be targeted by other children. This can also be the case for children who are perceived by other children to be LGBT. Our staff recognise the importance of all children and young people having a trusted adult in school they can talk to and we endeavour to support all pupils to identify at least one trusted adult in school they can share concerns with if they don't feel safe.

### **Pupils with mental health issues**

Where children have suffered abuse and neglect, or other potentially traumatic experiences this can have a lasting impact throughout childhood, into adolescence and into adulthood.

Regular safeguarding training ensures that staff are aware of how these children's experiences can impact on their mental health.

#### The following can be indicators of risk:-

- self-harm
- noticeable weight loss or gain
- change in personality e.g. mood swings
- frequently missing lessons
- social isolation
- lethargy and disinterest
- tearfulness or appearing anxious
- lack of focus in class
- change in educational performance

Children have access to support within school from our Inclusion Team and ELSAs. Children can be signposted for support from TAMHs, CAMHs and Trailblazers.

#### **2.8.5 Self-harm**

When concerns arise that a child may be at risk of, or has, self-harmed, parents will be contacted and appropriate support and advice given. This may result in a safety plan being developed, a referral to Trailblazers or signposting to other agencies.

### **2.9 Behaviour**

As a school we recognise that there can be links between safeguarding and child protection concerns and incidents of disruptive and challenging behaviour. We understand that children

can communicate an unmet need through their behaviour, whether this is challenging and disruptive or quiet and withdrawn. **Our school behaviour policy reflects this and includes the ways in which we respond in these situations.**

See also the school's pupil behaviour policy.

### **Physical Intervention**

Where physical intervention is required to keep a pupil safe the school will respond in line with the DfE guidance 'Use of reasonable force'

As a school we may intervene to:-

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

All incidents of physical intervention are recorded in the school's bound book and reported to parents/carers. Where a pupil has safeguarding /child protection records in place, information about incidents of positive handling will be cross-referenced. The bound book is kept within the child protection locked cabinet.

Following all incidents where physical intervention is required we routinely check the well-being of the pupil after the incident. This includes asking if they have been hurt. If information suggests that a pupil has been hurt during an incident of physical intervention the Head teacher will be informed and contact will be made with the LADO.

Where pupils require regular handling and intervention a positive handling plan will be put in place. The pupil, together with the parents/carers will be involved in this process.

Members of staff have been trained in Team Teach procedures.

### **2.10 Attendance**

*See also Working Together To Improve Attendance'  
See also the local authority's guidance on 'Children Missing Education'*

As a school we recognise the importance of pupils attending school regularly. Where pupils are persistently absent from school, this could be a possible indicator of neglect, abuse or exploitation.

As a school we recognise the importance of pupils attending school regularly. Any unexplained absence is followed up on the first day of absence.

Where possible, we hold more than one emergency contact telephone number for each pupil/family.

Pupil attendance is monitored. Beccy Nolan/Caroline Rouse, Nicky Crocker and our EWO monitor attendance termly. We recognise that children with poor attendance or missing from education may be more vulnerable and potentially are exposed to higher degrees of risk. Attendance information is therefore considered within the wider remit of safeguarding and

child protection. Staff are aware that episodes of unexplained absence could indicate safeguarding concerns or the need for early help support.

### **Attendance procedures during partial school closure/lockdowns**

During partial closure or lockdown, we ensure safeguards are in place, if there is no response from pupils following an attempt to contact, Contact Swindon would be contacted if the pupil is an open case.

#### **2.11 Pupils who are educated off site**

Where pupils are attending off-site alternative or enhanced provision, it is our responsibility to ensure that they continue to be kept safe. Quality assurance of any provision used by our school is completed prior to the placement of a pupil. This includes:-

- review of the provision's safeguarding and child protection procedures
- a visit to the site
- a letter of assurance to confirm that all staff working at the alternative provision have had the appropriate recruitment checks
- information about issues which the pupil attending the site might be at risk of, to inform an effective risk assessment

For each day that the pupil attends the off-site provision contact is made by Tracey Challoner to ensure they have arrived safely. This process also applies where a pupil has been excluded from school, including fixed term exclusions. Contact will be made with a parent or carer to confirm their safety on each day of the exclusion.

#### **2.12 Elective Home Education**

Where a parent/carers has expressed an intention to remove their child from school with a view to educating at home, we will endeavour to co-ordinate a meeting with the parents (and professionals as appropriate, including an LA representative) to ensure parents/carers have considered what is in the pupil's best interests.

We have a statutory duty to inform the local authority when a pupil is removed from our roll. Where a child has an Education and Health Care plan the local authority will need to review the plan, working closely with parents and carers.

#### **2.13 Intimate Care**

See also staff code of conduct

Intimate care includes any tasks that involve the dressing and undressing, washing including intimate parts, helping someone use the toilet, changing nappies or carrying out a procedure that requires direct or indirect contact to an intimate personal area.

Also see our Intimate Care Policy September 2024.

Staff administering intimate care are required to record this using the agreed protocols laid out in our intimate care policy.

### **Part 3 – Safeguarding Policy**

#### **3.1 How is the information in this set of policy and procedures disseminated?**



1. Our staff induction programme includes a safeguarding section and new staff are asked to read the safeguarding policy and procedures. This also applies to Governors and Trustees
2. Visitors, volunteers and external staff, including supply teachers, who visit our school are asked to read a visitors' code of conduct, which includes procedures for what to do if they have concerns about the safety of a pupil or concerns about the actions of an adult working/volunteering with children.
3. Our safeguarding policy and procedures are re-visited on an annual basis and time is set aside for staff to re-read the document. In order to check staff understanding of the content the policy and procedures are highlighted in staff meetings in the form of updates and scenarios.

In addition to reading and understanding the school's safeguarding and child protection policy and procedures, staff are required to read:-

- Keeping Children Safe In Education  
*See appendix 6 for guidance about reading of KCSIE*
- the school's staff code of conduct
- the pupil behaviour policy
- the safeguarding response for children missing in education (included within our attendance policy)
- the school's online safety policy and acceptable use agreement

Staff are asked to sign to confirm their understanding and accept responsibility for following up any questions or queries they have arising from reading this document (with a member of our safeguarding team). Staff are asked to sign to confirm that they have read and understood policies. All staff are encouraged to speak to a member of the safeguarding team should they have any queries or questions.

### **3.2 How do we ensure parents and carers understand the school's role in safeguarding pupils?**

1. This school is committed to helping parents/carers understand its responsibility for the welfare of all pupils and our duty of care. The policy and procedures are available to parents and carers via the school website and a paper copy can be requested by contacting the school office.
2. The school website also provides access to a number of useful resources for parents and carers. These can be found in the 'Safeguarding' tab of the school's website.
3. During pupil induction meetings for parents and carers information will also be discussed about the school's safeguarding responsibilities.

### **3.3 Roles And Responsibilities**

- The Governing Bodies have strategic leadership responsibility for safeguarding arrangements, ensuring that policies, procedures and training are effective and comply with the law (Part 2 KCSIE Sept 23).
- The Headteacher has a duty to ensure that the policies and procedures adopted by the governing body and proprietor are understood and followed by all staff. The Head teacher ensures the safeguarding team have time to engage in learning, audit and supervision.
- The Designated Safeguarding Lead (and Deputy DSL/s in the DSL's absence) works in line with Annex C of KCSIE and is a senior member of staff, from the leadership

team. This role carries a significant level of responsibility. See *KCSIE for further detail*.

- Staff have a duty to respond to safeguarding and child protection concerns in line with the procedures laid out in this policy and in the statutory guidance – ‘Keeping Children Safe In Education’. **‘All staff have a duty to do what is reasonable in all circumstances to safeguard and promote the welfare of pupils and staff.’** (Teachers’ Standards)

Governing bodies, proprietors, the Headteachers and the safeguarding team work together to ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

They take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific need. For example, taking positive action to support girls if there was evidence, they were being disproportionately subjected to sexual violence or sexual harassment. This includes making reasonable adjustments for disabled children and young people and those identified as having special educational needs.

Where there is a safeguarding concern, governing bodies, proprietors and the leadership team should strive to ensure that the child’s wishes and feelings are taken into account when determining what action to take and which services to provide.

The school completes an annual audit of safeguarding for the local authority, in partnership with the link safeguarding governor. This self-evaluation is quality assured with a visit from an independent consultant. Where weaknesses or areas for development are identified, the Governing Body monitors the implementation and impact of identified actions to address these issues. The Head of school provides a safeguarding report three times per year as part of the Head of school report to Governors.

### **3.4 Safeguarding Supervision**

All staff working in this school have a responsibility to safeguard the children in their care. Staff can only achieve this effectively if they:-

- are clear about what is expected of them
- have the skills, knowledge, behaviours, values and attitudes to carry out their role
- are fully supported in their role and managed effectively

Safeguarding supervision is available for any member of staff as required. Members of the safeguarding team receive planned safeguarding supervision *once every two weeks*.

Regular, planned safeguarding supervision is vital to ensure that there are opportunities for reflection and analysis of information as part of the decision-making process. Constructive challenge is encouraged, especially where assumptions are made and differences are resolved in a restorative and respectful way.

### **3.5 Use of school premises**

Where external organisations use the school premises, both within the school day and outside of school hours, the Governing Body has a responsibility to:-

\* seek assurance that the body concerned has appropriate policies and procedures in place in regard to safeguarding pupils This includes checking that the organisation's safeguarding policy is fit for purpose and includes procedures for reporting concerns about adults who may work/volunteer with children.

\* ensure that the appropriate level of safer recruitment checks have been completed on staff working for the organisation

### **3.6 Safer Recruitment Procedures**

This school works in line with Part 3 of Keeping Children Safe In Education.

Checks completed on all staff and regular volunteers

- An enhanced DBS certificate, which includes barred list information, is required for any staff who will be engaging in regulated activity (working unsupervised with children). This is required for any staff employed since 2002. Prior to this staff were checked against List 99. Following completion of the DBS check, we require the individual to provide the original DBS certificate in person for checking, in addition to receiving the electronic confirmation from the service we use for the check.
- Identity checks are completed, together with proof of right to work in the UK
- Qualifications are checked
- If an individual has lived or worked outside of the UK an overseas police check / certificate of good conduct may be required
- Right to work checks are completed on all staff.

In addition, staff who have a teaching role will be checked, via the DfE Secure Access Website, for

- qualified teacher status
- prohibition check
- section 128 check (for any individual who has a managerial role, including Heads of Department, Governors and Trustees in academies )
- completion of induction
- teacher not subject to a conditional offer/suspension

### **Online searches**

An online search is completed for all short-listed candidates who apply to work in our school. A basic check is completed using *frameworks* to identify any publicly available information of concern which:-

- could pose a safeguarding risk to children /young people
- cause damage the reputation of the school

Where information of concern is identified, this will be discussed with the candidate before a decision is made about suitability for the role being advertised. A record is made of the check and any subsequent actions required, along with the outcome.

### **Visitors and externally employed staff**

Where staff from external organisations are working with our pupils, we ensure that the letter of assurance received confirms that the relevant checks are in place, including a barred list check if the individual is working in regulated activity. Visitors are asked to provide proof of identity and if required, DBS information.

### **Single Central Record**

The school maintains an up to date single central record of all safer recruitment checks. This is in line with the requirements as set out in Part 3 of Keeping Children Safe In Education. The Head teacher monitors this record termly and ensures it is in line with statutory requirements.

### **Induction of new staff**

Following appointment, the school offers new staff a programme of safeguarding and child protection induction. This includes:-

- face-to-face meetings and training sessions with a safeguarding lead
- review of key policy documents

\*introduction to key members of the staff including the safeguarding team and accessing external led training e.g. CP level 1, as required.

### **Childcare Disqualification Checks**

The 'Disqualification Under the Childcare Act 2006 states that :-

'Schools are responsible for ensuring that anyone who falls within the relevant categories of staff described in the staff covered and staff who may be covered sections is made aware of the legislation. Schools must make these staff aware of what information will be required of them and how it'll be used to make decisions about disqualification. Schools are free to decide how to bring these requirements to the attention of their staff. As a means of making staff aware of their duty to provide such information, they may, for example, choose to include a section in the school's safeguarding policy, or another policy document, or by means of an addition to new staff members' contracts of employment. Schools should draw this guidance to the attention of their staff and the information provided by Ofsted referenced in this guidance.'

This information is shared with staff at the start of each academic year and may be revisited during termly update sessions.

### **3.7 Online Safety**

*See our school's Online Safety Policy*

*See also KCSIE*

*See also 'Teaching Online Safety In Schools' (non-statutory guidance)*

Technology is a significant component in many safeguarding and well-being issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

Children can abuse their peers online, this can take the form of abusive, harassing and misogynistic messages, the consensual and non-consensual sharing of indecent images and the sharing of abusive images and pornography, to those who do not want to receive such content.

### **Responding to online safety concerns**

Staff will follow our safeguarding procedures as outlined in Part 1 of this document. Staff should also be aware of the additional guidance in Part 2 under 'child on child abuse, where additional guidance is provided, in relation to responding to concerns about the sharing of indecent images via mobile devices.

### **What are the school's responsibilities around online safety?**

### This school recognises:-

- the increasing role technology has to play in education and children's daily lives
- the wide-range of content which is available to children via the internet
- that alongside the benefits of technology, there are also risks
- the importance of delivering a broad and relevant online safety curriculum which provides progression across year groups
- that delivery of this curriculum must be provided via regular lessons, which take place throughout each term
- the importance of keeping up to date with the tools, apps and devices children are using so that the curriculum which is offered is meaningful
- that online safety must be reflected in all relevant school policies
- Is responsibility to work in line with the Filtering and Monitoring standards. and takes all reasonable action to limit children and young people's exposure to the risks from the school's IT system.

### **What our online safety curriculum offers**

- Our online safety curriculum covers four aspects of risk – content, contact, conduct and commerce Key online safety messages (such as Childnet's SMART rules) which are reinforced at every opportunity across the curriculum, in assemblies, PSHE lessons
- Pupils are taught in all lessons to be critically aware of the materials and content they access on-line and understand that not everything they see online is true
- Pupils are supported in building resilience to radicalisation. A safe environment is provided for debating controversial issues and helping them to understand how they can influence and participate in decision-making.

### **Filtering and monitoring**

*Part 2 KCSIE for further information*

#### *Our Online safety policy*

As part of the work we do to provide pupils/students with a safe environment in which to learn, we ensure that we have appropriate filtering and monitoring systems in place. Harmful and inappropriate content is blocked without unreasonably impacting on teaching and learning.

We work collaboratively to keep pupils/students safe in the online world.

- Governing bodies and proprietors have responsibility for ensuring the school has appropriate filtering and monitoring systems in place, taking into account the age of our pupils/students and those who are potentially at greater risk of harm. We have a named governor for filtering and monitoring in our school (see quick reference guide at front of policy).
- Senior leaders, including the DSL have an awareness and understanding of the systems in place. An annual review of online safety takes place, including review of filtering and monitoring systems. Securely is used. These systems are checked *throughout the year regularly*.
- Staff have an awareness of provisions in place and know how to respond when concerns are identified. Staff are provided with online safety training, at induction and at regular intervals.

- Within the four key areas of risk (Content, Contact, Conduct and Commerce), pupils/students are taught about the steps they should take if they identify illegal, inappropriate or harmful content online.

### **Use of mobile technology**

*Refer to esafety policy.*

### **Use of technology during partial school closure/lockdowns.**

This school recognises:-

- the increasing role technology has to play in education and children's daily lives, and the increased use during times of lockdown
- the wide-range of content which is available to children via the internet
- that alongside the benefits of technology, there are also risks

For those who are not physically attending school during partial school closure, we recognise that these pupils will be spending increased time online, either participating in school work, taking part in live streaming of lessons and/or as part of extended 'free-time'.

We recognise that this will pose increased risk to children, including:-

- Grooming
- Exploitation, both criminal and sexual
- Radicalisation
- Child on child abuse, including cyber-bullying
- Sexual harassment

All staff who interact with pupils/students, including remote interactions, will continue to be vigilant and look out for signs that a child's safety and welfare might be at risk. Further guidance to keep pupils/students and staff safe when working remotely can be found in Safer Working Practice)

In addition, pupils are sign-posted to age appropriate practical support should they have worries or concerns whilst online. Links to support are available via our school website and include:-

UK Safer Internet Centre Hotline

Child Exploitation and Online Protection Centre

.

### **3.8 Whistle-blowing**

This school expects the highest standards of conduct from all employees and governors and will treat seriously any concern raised about illegal or improper conduct. The law provides protection for employees who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by the employee who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety

- an act causing damage to the environment
- a breach of any legal obligation
- a concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be committed, a reasonable belief is sufficient. The employee has no responsibility for investigating the matter; it is the school's responsibility to ensure that an investigation takes place.

Staff and volunteers are encouraged to raise concerns about poor or unsafe practice and potential failings in the school's safeguarding regime via:-

- the staff handbook
- the staff code of conduct
- the visitor's/volunteer's code of conduct

In the first instance, unless the employee reasonably believes their Head teacher to be involved in the wrongdoing, any concerns should be raised with the employee's Head. If he/she believes the Head teacher, then the employee should proceed straight to the CEO

Where a member of staff feels unable to raise a concern with either of the individuals identified above the [NSPCC whistle-blowing helpline](#) is available to them.

### **3.9 Training For Adults Working/Volunteering In Our School**

We are committed to ensuring staff and volunteers know and understand:-

- the signs and symptoms of abuse;
- how to identify pupils who may benefit from early help;
- their responsibility for referring concerns to the designated safeguarding lead / deputy;
- the procedures for reporting safeguarding /child protection concerns about adults working with children (allegations)

#### **Staff training**

The following training is provided at induction and subsequently on a regular basis to all staff:-

- Safeguarding and child protection training
- Online safety training
- Prevent training

Governors/Trustees are provided with strategic safeguarding training at induction and as subsequent updates. This training includes a focus on the safeguarding roles and responsibilities of all governors/trustees and equips them to provide strategic challenge to test and assure themselves that safeguarding policies and procedures are effective

Volunteers, including Governors and work experience students, are provided with an induction programme which includes Child Protection and Safeguarding information.

#### **Updates**

In addition to formal training, all staff receive regular opportunity to update their knowledge and understanding and ensure they are aware of new and emerging threats.

These updates include a focus on:-

- Sexual abuse
- Child on child abuse, including sexual violence and harassment
- Early Help
- Trauma and adversity
- Radicalisation and the Prevent Duty
- Honour-based abuse, including Female Genital Mutilation
- Exploitation, including child criminal exploitation and child sexual exploitation
- Child mental health
- Parent mental health
- Domestic abuse
- Online safety including filtering and monitoring
- Forced marriage and honour-based violence
- Child-trafficking
- Children missing education and children absent from education

These are delivered via staff meetings, safeguarding scenarios, newsletters and training. These happen at least annually.

### **Additional training for Designated Safeguarding Leads and deputy DSLs**

The statutory requirement for DSLs and deputy DSLs is to renew training every 2 years. We work in line with this requirement.

Our deputy DSL has completed advanced training to the same level as the DSL, in line with the requirements of our Local Authority.

In addition, the members of our safeguarding team complete:-

- \* FGM training
- \* Additional Prevent training in line with statutory requirements (2 yearly)

### **3.10 Record Keeping**

Safeguarding records, including records relating to staff and the SCR, are kept in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), which places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance '[For Organisations](#)' which includes information about your obligations and how to comply, including protecting personal information and providing access to official information.

### **Appendix 1**

This policy and set of procedures work in line with the following legislation, statutory guidance and non- statutory guidance:-

#### Legislation

- The Education Regulations (Independent School Standards) 2014 - Independent schools including academies and free schools
- The Education and Training (Welfare of Children) Act 2021



## Statutory Guidance

- [Keeping Children Safe In Education](#)
- [Working Together To Safeguard Children](#)
- [Children's Social Care National Framework](#)
- [Working Together To Improve Attendance](#)
- [The Prevent Duty Guidance – Home Office](#)
  
- [Multi-agency statutory guidance on Female Genital Mutilation](#)
- [The Early Years' Framework](#)
- [Relationships Education, Relationships and Sex Education and Health Education](#)
  
- [Filtering and Monitoring Standards for schools and colleges](#)

## Non-statutory Guidance

- [What to do if you are worried a child is being abused](#)
- [The Prevent duty: an introduction for those with safeguarding responsibilities](#)  
[Information-sharing: advice for safeguarding practitioners](#)
- [Children Missing Education](#)
- [Teaching Online Safety In School](#)
- [Safer Working Practice Guidance For Adults Working With Children and Young People](#)
- [Behaviour and Discipline in Schools](#)
- [Mental health and Behaviour In Schools](#)
- [Searching, screening and confiscation](#)
- [Working Together To Improve School Attendance](#)
- [The Prevent Duty Guidance](#)

## In addition, the school takes into account:-

- Regional guidance
- the procedures and practice of the local authority

## Appendix 2 – Definitions of Abuse (taken from Working Together To Safeguard Children)

### Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

## **Neglect**

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

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

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

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

## **Emotional Abuse**

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

## **Sexual Abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Appendix 3  
Safeguarding and Child Protection  
Concern / Incident Form  
CONFIDENTIAL**

<b>Date:</b>		<b>Name and role of person completing form</b>	
<b>Time:</b>		<b>Date and time read by DSL / Deputy DSL</b>	
<b>Name of pupil:</b>		<b>DOB:</b>	
<b>Location (if applicable)</b>			
<b><u>What have I seen/heard/noticed which concerns me?</u></b>			
<b><u>What am I worried about?</u></b>			
<b><u>Is this concern linked to any previous concerns I have reported?</u></b>			
<b><u>Action I have taken</u></b>			
<b>To be completed by a member of the safeguarding team</b>			

<p><i>Include reference here to other members of the safeguarding team you may have discussed the case with</i></p> <p><b>Discussion of next steps agreed with:-</b></p>          <p><b>Record of discussion with another professional, external to the school (giving full name/ role and agency)</b></p>	
<p><b>Detail of decision / action agreed by DSL or deputy:</b></p>          <p><b>Has the local authority threshold guidance been referred to at this point?      Yes / No</b></p> <p><b>Has the person who reported the initial concern been provided with feedback? Yes / No</b></p>	
<p><b>Reason(s) for this decision or action by DSL or deputy:</b></p> <p><i>Does the pupil need to be monitored? Yes/No</i>  <i>If yes, when will the case be reviewed?</i></p>          <p><i>Is Early Help support appropriate? Yes / No</i>  <u>Reason for decision</u></p>          <p><i>Is a referral to children's social care required? Yes/No</i>  <i>Does the school have evidence that the threshold for significant harm has been met? (child protection) Yes/No</i>  <i>Reason for decision</i></p>	
<p><b>Tick to confirm added to pupil's chronology and copy placed on file</b></p>	

**Appendix 4  
Prompt sheet**

**Safeguarding and Child Protection  
Prompt sheet**

This form is intended to be used, alongside the concern/incident form, to support staff with the recording of safeguarding and child protection concerns/incidents.

Have you remembered to include:-

1. **what is it that you have seen/heard/noticed which concerns you?** Remember if you have noticed a mark on the pupil, it is really important to complete an attached body map, giving an indication of the shape, size and location of the mark.  
  
Has the child communicated that something is wrong? Verbally? Change in behaviour?
2. **clear and factual information about what you have seen/heard/noticed?** If you have included your opinion in your report, have you made it clear that this is your opinion?
3. **full names of those involved and where possible, reference to staff roles?**
4. **why what you have seen/heard/noticed concerns you?** What are worried will happen if this concern/incident is not responded to?
5. **any actions you have already taken?**
6. **whether you have spoken to parents/carers about the concern/incident?**  
Remember, you may need to seek advice from a member of the safeguarding team if you are unsure about whether speaking to the parent may increase the risk to the pupil. If the parent is the alleged perpetrator you must always seek advice from the safeguarding team before speaking to the parent/carer.

**Appendix 5 -  
 Low Level Concerns / Allegations Record  
 Adult working or volunteering with children/young people  
 CONFIDENTIAL**

<b>Name of adult at centre of concern/allegation</b>		<b>Role</b>	
<b>Name of person completing form</b>		<b>Role</b>	
<b>Date of concern/allegation</b>		<b>Date record made</b>	
<b>Name of child /children involved if applicable:</b>			
<b>Has concern/allegation arisen during the adult's time on school site or outside of school?</b>			
<b><u>Details of the concern/ allegation</u></b>			
<b>Is the adult aware of the concern/allegation?</b>			
<b>Action taken by person(s) completing the form:</b>			
<b>Who has the concern/allegation been shared with? DSL / Head teacher/Chair of Governors</b>			

<p><b>To be completed by the Head teacher/ Chair of Governors / CEO</b></p>
<p><b>Does the information provided suggest that the adult has:-</b></p> <ul style="list-style-type: none"> <li>• behaved in a way that has harmed a child, or may have harmed a child;</li> <li>• possibly committed a criminal offence against or relating to a child;</li> <li>• behaved towards a child or children in a way that indicates that he/she may pose a risk of harm to children</li> <li>• behaved or may have behaved in a way that indicates they may not be suitable to work with children.</li> </ul>
<ul style="list-style-type: none"> <li>• <b>has the LADO/DOFA been contacted? Yes/No</b> If yes has a local authority referral form been completed and submitted?</li> <li>• <b>has advice been taken from any other professionals? Yes / No</b></li> </ul> <p><i>Include details of professionals spoken to</i></p>
<p><b>Details of decisions and actions taken</b> <i>Include here details of</i></p> <ul style="list-style-type: none"> <li>• <i>strategy discussion</i></li> <li>• <i>allegations management meeting</i></li> <li>• <i>no involvement by LADO/DOFA – low level concern to be dealt with internally</i></li> <li>• <i>disciplinary procedures</i></li> <li>• <i>no further action</i></li> </ul> <p><i>as applicable</i></p>
<p><b>Include here any safeguards which have been put in place in response to the report</b> <i>Include here details of</i></p> <ul style="list-style-type: none"> <li>• <i>additional adult supervision implemented</i></li> <li>• <i>risk assessment required</i></li> <li>• <i>additional staff training required</i></li> <li>• <i>duties away from children</i></li> <li>• <i>suspension during investigation</i></li> </ul>
<p><b>If a child or children has been involved, have parents/carers been informed?</b> <b>Yes / No</b> <b>If Yes, what action would they like to see?</b></p>
<p><b>Outcome</b> If it is agreed that the LADO/DOFA needs to conduct an investigation, has the school been informed of the final outcome at the end of the process? <b>Substantiated/ Malicious/ False/ Unsubstantiated/ Unfounded</b></p>

## Appendix 6

### Safeguarding Reading List

'Keeping Children Safe In Education' Sept 2024 requires staff to read the following documents:-

Document title
1. The school's safeguarding and child protection policy and procedures (most recent version)
2. Part 1 of Keeping Children Safe In Education (Sept 24 <b>or</b> Annex A ( <i>staff are assigned which of these sections they are required to read by the Head of school</i> ))
3. Annex B Keeping Children Safe In Education (Sept 24)
4. Annex C – the role of the Designated Safeguarding Lead and deputy/deputies (KCSIE Sept 24)
5. Staff code of conduct/staff behaviour policy
6. Acceptable use policy (for use of technology and devices)
7. The safeguarding response for children missing in education (from the school's attendance policy)
8. The school's pupil/student behaviour policy and procedures

### Additional roles and required reading

Head teachers, Principals and DSLs	<ul style="list-style-type: none"> <li>• Working Together To Safeguard Children</li> <li>• KCSIE – whole document</li> </ul>
Staff with a lead for behaviour	<ul style="list-style-type: none"> <li>• Part 1 and Part 5 of KCSIE</li> <li>• Annex C (in addition to annexes listed on page 1)</li> </ul>
Staff involved in recruitment	<ul style="list-style-type: none"> <li>• Part 1 KCSIE</li> <li>• Part 3</li> <li>• Annex E (in addition to annexes listed on page 1)</li> </ul>
HR staff	<ul style="list-style-type: none"> <li>• Part 1 KCSIE</li> <li>• Part 3</li> <li>• Part 4</li> <li>• Annex E (in addition to annexes listed on page 1)</li> </ul>
Staff who have responsibility for IT and online safety	<ul style="list-style-type: none"> <li>• Part 1 KCSIE</li> <li>• Part 2</li> </ul>



## **Appendix 7**

### **Identifying support for pupils during partial school closure/lockdowns**

The school's safeguarding team and senior leaders review all pupils on the school's safeguarding and child protection overview.

A risk assessment is completed to identify a graduated offer of support for these pupils and any additional pupils whose welfare and safety may be at risk as a result of the partial closure of school, but who may previously not have been on the school's safeguarding overview.

### **Arrangements to support vulnerable pupils**

Vulnerable children include children who are supported by social care, those with safeguarding and welfare needs, including child in need plans, on child protection plans, 'looked after' children, young carers, disabled children and those with education, health and care (EHC) plans, although many pupils/students on EHCPs can remain safely at home.

Arrangements will be made for these pupils to continue attending school. **We also have the flexibility to offer a place in school for any pupil who we believe to be on the edge of receiving children's social care support.**

Support for these pupils includes:-

- Regular communication with and agreed support from lead professional/social worker/Virtual Headteacher
- Continued involvement with Children's Services and other external professionals as part of review cycle e.g. Child protection conference involvement and core group reviews. These will take place in line with local safeguarding partners' advice.
- Sign-posting respite available for families with children who have special educational needs and disabilities

Where pupils who are deemed vulnerable are not attending school, the following safeguards have been put in place to support, in addition to the points above:-

- Doorstep safe and well checks weekly.
- Lead professional/social worker/Virtual Headteacher made aware of non-attendance at school and additional support from these professionals agreed
- Telephone contact at least twice weekly.
- System in place for pupils to alert safeguarding team if at risk – children are given instructions on appropriate use of virtual contact and two members of staff and guidelines were given to parents on appropriate use. Monitoring of online activity and virtual learning ensuring the safety of all children and the adult being in control of the situation virtually to act where needed.
- Links to support available made available on school website.
- Risk assessments written with parents/carers to support pupils during time at home.
- Where needed Lighthouse referral was made and additional support offered.

### **Arrangements to support pupils we are concerned about but who do not meet the 'vulnerable' definition**

In addition to those pupils identified as vulnerable, we are aware of the following groups who may be at increased risk during this time.

### Pupils who are living in households where there is domestic abuse

Support includes:-

- Telephone contact at least twice a week.
- Links to support available on school website, including contact numbers for [National Domestic Abuse Helpline](#)
- Ensuring victims are aware of the Government advice that they are able to leave their house to seek refuge if their safety is at risk
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required
- Where needed Lighthouse referral was made and additional support offered.

### Pupils who have mental health issues, including anxiety and depression

Support includes:-

- Teacher to contact with pupils to check on well-being via school email systems or virtual learning environments. Staff aware of safeguarding procedures to follow if they have concerns about a pupil welfare
- Support from the school's inclusion team
- Links to support available on school website, including [Young Minds](#) and [Childline](#)
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required
- Where needed Lighthouse referral was made and additional support offered.

### Pupils who are at risk of child on child abuse, including cyber-bullying

Support includes:-

- Teacher contact with pupils to check on well-being via school email systems or virtual learning environments. Staff aware of safeguarding procedures to follow if they have concerns about a pupil welfare
- System in place for pupils to alert safeguarding team if at risk. When staff deliver virtual check ins they have ChildLine contact numbers visible. Staff are aware and have a clear process of how to contact safeguarding team with any concerns.
- Risk assessments written with parents/carers to support pupils during time at home
- Links to support available on school website, including resources for parents to access to keep their children safe online e.g. [Kidscape](#)
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required

### Pupils who are at risk of being left at home unsupervised

- Clear communication with parents/carers about the importance of keeping their children safe whilst they are at home, including appropriate supervision, both in the 'real world' and online
- System in place for pupils to alert safeguarding team if at risk. When staff deliver virtual check ins they have ChildLine contact numbers visible. Staff are aware and have a clear process of how to contact safeguarding team with any concerns.

- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required

Send out a communication on website and all other platforms that provide guidance on how to get additional support (i.e. food bank referrals) via a contact number/email to activate support.

This document was last reviewed and updated on *1<sup>st</sup> September 2024*  
The next scheduled review of this document is *1<sup>st</sup> September 2025*

Signed:.....(Head teacher/Principal)

Date:

Signed:.....(Chair of Governors)

Date

### Appendix 8 - Individual Pupil/Student Risk Assessment

<b>Pupil/Student</b>	
<b>Date of birth</b>	
<b>Class/Year group</b>	
<b>Date risk assessment written</b>	
<b>Date for review</b>	
<b>Who has been involved in the writing of the assessment? (including child/parents/carers)</b>	
<b>Professionals who need to be aware of the assessment (including school staff and multi-agency professionals)</b>	
<b>Consent given by parents/carers</b>	<b>Signature</b> <b>Date</b>

Provide a brief overview below of events leading up to a risk assessment being considered	
What category/categories of harm does this involve?	Physical/Emotional/Sexual/Neglect
What behaviours are displayed? What are the outward signs?	
Does the risk of harm include:-	Risk to the child themselves Risk to peers Risk to staff
Possible triggers?	
Are there are times of the day when the risk is increased?	<i>Include detail here</i>

What additional support /supervision is in place to mitigate at these times?	<i>Include details about which staff are involved in supervision</i>
Are there are areas of the school/grounds where risk is increased?	<i>Include detail here</i>
What additional support /supervision is in place to mitigate in these areas?	
How will risk be managed off site? E.g. school trips, alternative provision	
Has the child been spoken to about their behaviours?	
What sensory / physical difficulties, medical issues (including medication), communication difficulties, need to be taken into account? Are there any issues such as previous abuse, family dynamics, psychological problems that may impact upon the child's level of impulsiveness, perception of danger, emotional response, etc?	
What are the factors that contribute to the level of risk? For example, environmental cues, frustration, confusion, peer dynamics, level of demand. Please indicate factors that pose a risk in both the short and long term.	
Any additional information	

--	--

How will this assessment be monitored?	
Has the Brook tool been referred to as part of this assessment?	Yes / No
Who has responsibility for monitoring?	