

SAFEGUARDING, CHILD PROTECTION, PREVENT AND MISSING FROM EDUCATION POLICY



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Safeguarding, Child Protection, Prevent and Missing from Education Policy

Employability Solutions Ltd is fully committed to the well-being of students and staff and those who have direct links with the organisation. Employability Solutions Ltd actively promotes the positive welfare of students, young people and those with additional needs and expects all staff, volunteers and partners to endorse and practise this commitment at all times.

The CEO and all staff at Employability Solutions Ltd regard each student as a unique individual and therefore seek to support their development in ways which will foster security, confidence and independence. We recognise that high self-esteem, peer support, a safe and secure learning environment and clear lines of communication with trusted adults helps all students and young people. These are regarded as central to the wellbeing of the individual and are therefore seen to be an intrinsic part of all aspects of the curriculum and ethos of the organisation.

The aim of the policy is to safeguard all students, particularly children, young people and those with identified needs, and those studying in the workplace (Work placements/work experience). To safeguard Employability Solutions Ltd, all staff and volunteers in carrying out their duties in teaching, supervising and supporting students at all centres or in the workplace.

Employability Solutions revises this policy on an annual basis, in line with new legislation and recommendations:

- Keeping Children Safe in Education September 2021
- Inspecting Safeguarding in Early Years, Education and Skills Settings September 2019
- Counter Terrorism and Security (Prevent Legislation) 2015

Employability Solutions is also committed to ensuring freedom of speech in relation to Section 43 of the Education Act 1986, The Equality Act 2010 and The Human Right Act 1998.

This policy applies to:

- All students, particularly children, young people and those who have additional or high needs.
- All staff, volunteers and partners working at Employability Solutions Ltd or the workplace.



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Important contacts

ROLE/ORGANISATION	NAME AND CONTACT DETAILS	
Designated safeguarding (DSL) lead	<p>Nadia Miller Director of Student Services Tel (Office): 01484 506307 Tel (Mobile): 07955 028530 Email: nadia@employabilitysolutions.com</p> <p>Nikki Sullivan, Director of Student Services Huddersfield Tel (M): 07841139719 Email: nikki@employabilitysolutions.com</p>	
Deputy DSL	<p>Eve Bartlet, Executive Headteacher Tel (M): 07971285829 Email: eve@employabilitysolutions.com</p> <p>Catherine Cook, Chief Operations Manager Tel (M): 07876 798531 Email: catherine@employabilitysolutions.com</p>	
Local authority designated officer (LADO)		01484 226 748
Chair of governors	<p>Claire Cook, Chief Executive Officer and proprietor Tel (M): 07515 285716 Email: claire@employabilitysolutions.com</p>	
Channel helpline		020 7340 7264
Prevent Team (Kirklees)	<p>Kirklees Prevent Hub: 01924 483747 Prevent Coordinator – Matt Brayford - 01484 221 000 Channel Coordinator – Daniel Dearnley – 01484 221 000 Prevent Engagement Manager – Alyson CLarkson – 01484 221 000 Email: prevent@kirklees.gov.uk or alysonz.clarkson@kirklees.gov.uk Website referral form: http://www.kirklees.gov.uk/beta/community-safety-partners/making-a-channel-referral.aspx</p>	



Safeguarding, Child Protection, Prevent and Missing from Education Policy

ROLE/ORGANISATION	NAME AND CONTACT DETAILS
Kirklees Safeguarding Children Board (KSCP)	<p>The KSCP has responsibility for ensuring there are effective inter-agency procedures in place for dealing with allegation against people who work with children and for monitoring and evaluating these.</p> <p>Mezzanine Floor, Brian Jackson House, 2 New North Parade, Huddersfield, HD1 5JP Tel: 01484 225 218 Email: KSCBAdmin@kirklees.gov.uk</p>

1. Aims

The school aims to ensure that:

Appropriate action is taken in a timely manner to safeguard and promote children's welfare

All staff are aware of their statutory responsibilities with respect to safeguarding

Staff are properly training in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

[The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

[The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

[Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

3. Definitions

Safeguarding and promoting the welfare of children means:

Protecting children from maltreatment

Preventing impairment of children's mental and physical health or development

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

Taking action to enable all children to have the best outcomes

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



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

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

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

The local authority (LA)

A clinical commissioning group for an area within the LA

The chief officer of police for a police area in the LA area

4. Equality statement

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

We give special consideration to children who:

Have special educational needs (SEN) or disabilities or health conditions (see section 10)

Are young carers

May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

Have English as an additional language

Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

Are asylum seekers

Are at risk due to either their own or a family member's mental health needs

Are looked after or previously looked after (see section 12)

Are missing from education

Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

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

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

Our systems which support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education

The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play



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What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is:

Nadia Miller

Director of Student Services

Tel (Office): 01484 506307

Tel (Mobile): 07955 028530

Email: nadia@employabilitysolutions.com

Nikki Sullivan,

Director of Student Services Huddersfield

Tel (M): 07841139719

Email: nikki@employabilitysolutions.com

The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSL is absent, the deputies – will act as cover

Claire Cook,

Chief Executive Officer and proprietor

Tel (M): 07515 285716

Email: claire@employabilitysolutions.com

Eve Bartlet,

Executive Headteacher

Tel (M): 07971285829

Email: eve@employabilitysolutions.com

Catherine Cook,

Chief Operations Manager

Tel (M): 07876 798531

Email: catherine@employabilitysolutions.com

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

Provide advice and support to other staff on child welfare and child protection matters

Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

Contribute to the assessment of children

Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description.



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5.3 The governing board

The governing board will:

Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development

Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation

Appoint a senior board level (or equivalent) lead **Claire Cook** to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The headteacher

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

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

Communicating this policy to parents/carers when their child joins the school and via the school website

Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

You should note that:

Timely information sharing is essential to effective safeguarding

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

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

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".



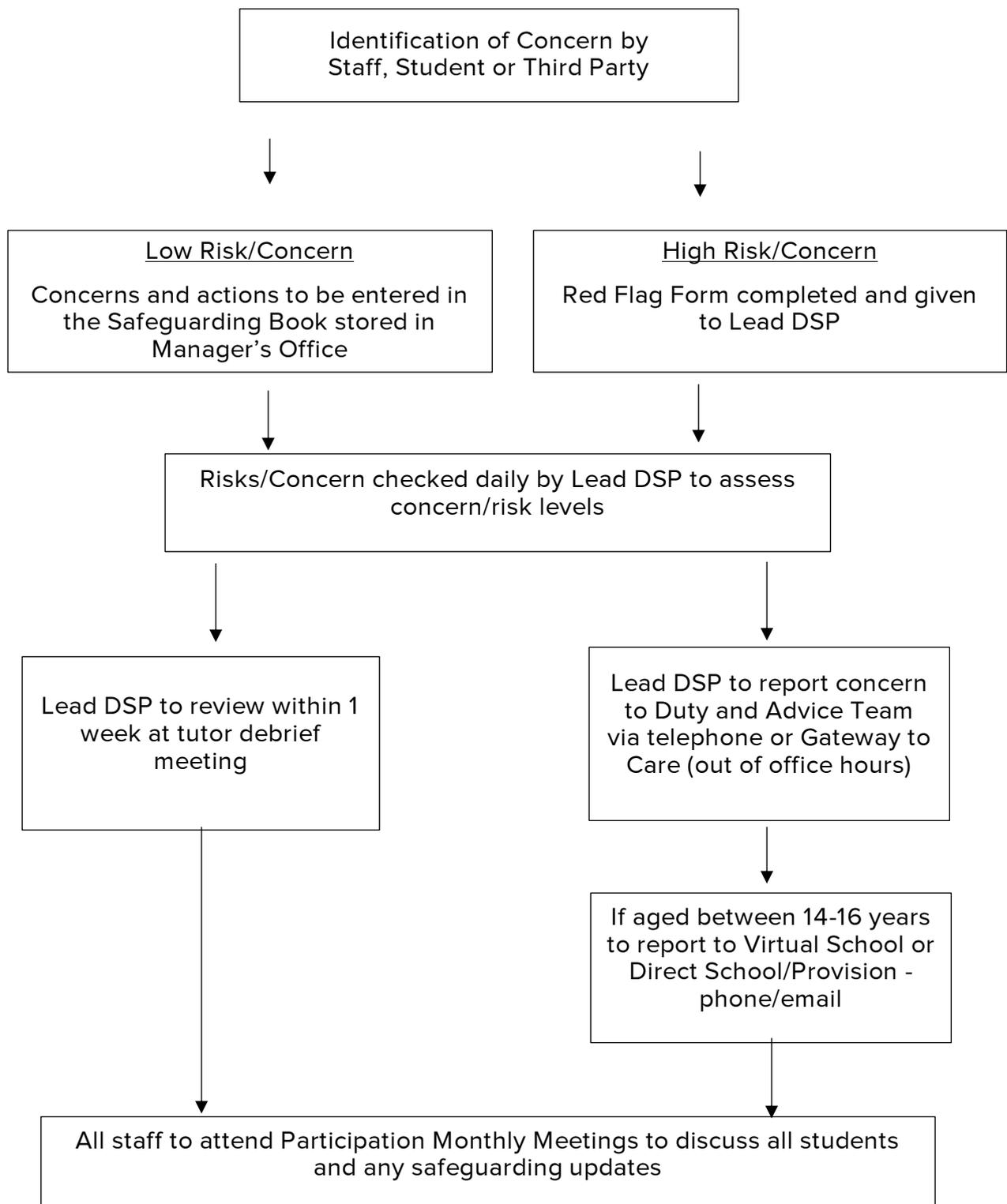
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7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

REPORTING SAFEGUARDING CONCERNS FLOWCHART





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Employability Solutions Ltd (normally via the Designated Senior Person) will refer concerns that a young person might be at risk of significant harm to someone at the following contact numbers:

Duty and Advice Team on 01484 456 848 (9am-5pm office hours) / 01484 414 960 (for professionals)
Kirklees Emergency Duty Service (Gateway to Care) on 01484 414 933 (outside office hours)
If you are a child: 01484 456 848 or Child Line on 0800 11 11
NSPCC Helpline on 0808 800 5000
NSPCC Email on help@nspcc.org.uk
NSPCC text on 88858 (free service)
NSPCC online form - <https://forms.nspcc.org.uk/content/nspcc---report-abuse-form/>

Support is also available from:

Local Authority Designated Officer (LADO)

Tel: 01484 226 748

Kirklees Safeguarding Children Partnership (LSCP)

Tel: 01484 225 218

Email: KSCBAdmin@kirklees.gov.uk

Website: <http://www.kirkleessafeguardingchildren.co.uk/>

Schools Safeguarding Officer – Michelle Hodges and Maxine Wood

Tel: 01484 221 919

Email: schoolsafeguardingofficer@kirklees.gov.uk

Child Protection and Review Unit

Tel: 01484 221 000 / 01484 225 850

Email: pru.reports@kirklees.gov.uk

Kirklees District Safeguarding and Reviewing Unit (Police)

Tel: 01924 431 134

Email: kirklees.sguchild@westyorkshire.pnn.police.uk

Children Missing from Education/Pupil Tracking Officer

Tel: 01924 326 509

Email: missing.children@kirklees.gov.uk

Kirklees Council – Concerns about a child

Tel: 01484 221 000 (Main Switchboard)

Website: <http://www.kirklees.gov.uk/beta/child-protection/concerns-about-a-child.aspx>

Follow the link to the GOV.UK webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

7.2 If a child makes a disclosure to you

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

Listen to and believe them. Allow them time to talk freely and do not ask leading questions

Stay calm and do not show that you are shocked or upset

Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.



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Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

7.3 If you discover that FGM has taken place, or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

There are 4 types of procedure:

Type 1 - Clitoridectomy – partial/total removal of clitoris

Type 2 - Excision – partial/total removal of clitoris and labia minora

Type 3 - Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 - all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage.
- Preserves a girl’s virginity.
- Part of being a woman/rite of passage.
- Uphold family honour.
- Cleanses and purifies the girl.
- Gives a sense of belonging to the community.
- Fulfils a religious requirement.
- Perpetuates a custom/tradition.
- Helps girls be clean/hygienic.
- Is cosmetically desirable.
- Mistakenly believed to make childbirth easier.



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Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in the UK and most countries.

Circumstances and occurrences that may point to FGM happening

- Young person talking about getting ready for a special ceremony.
- Family taking a long trip abroad.
- Young person's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan).
- Knowledge that the young person's sibling has undergone FGM.
- Young person talks about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a Young Person has undergone FGM:

- Prolonged absence from education and other activities.
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinal tract infection.
- Disclosure.

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

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.



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If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

Think someone is in immediate danger

Think someone may be planning to travel to join an extremist group

See or hear something that may be terrorist-related

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

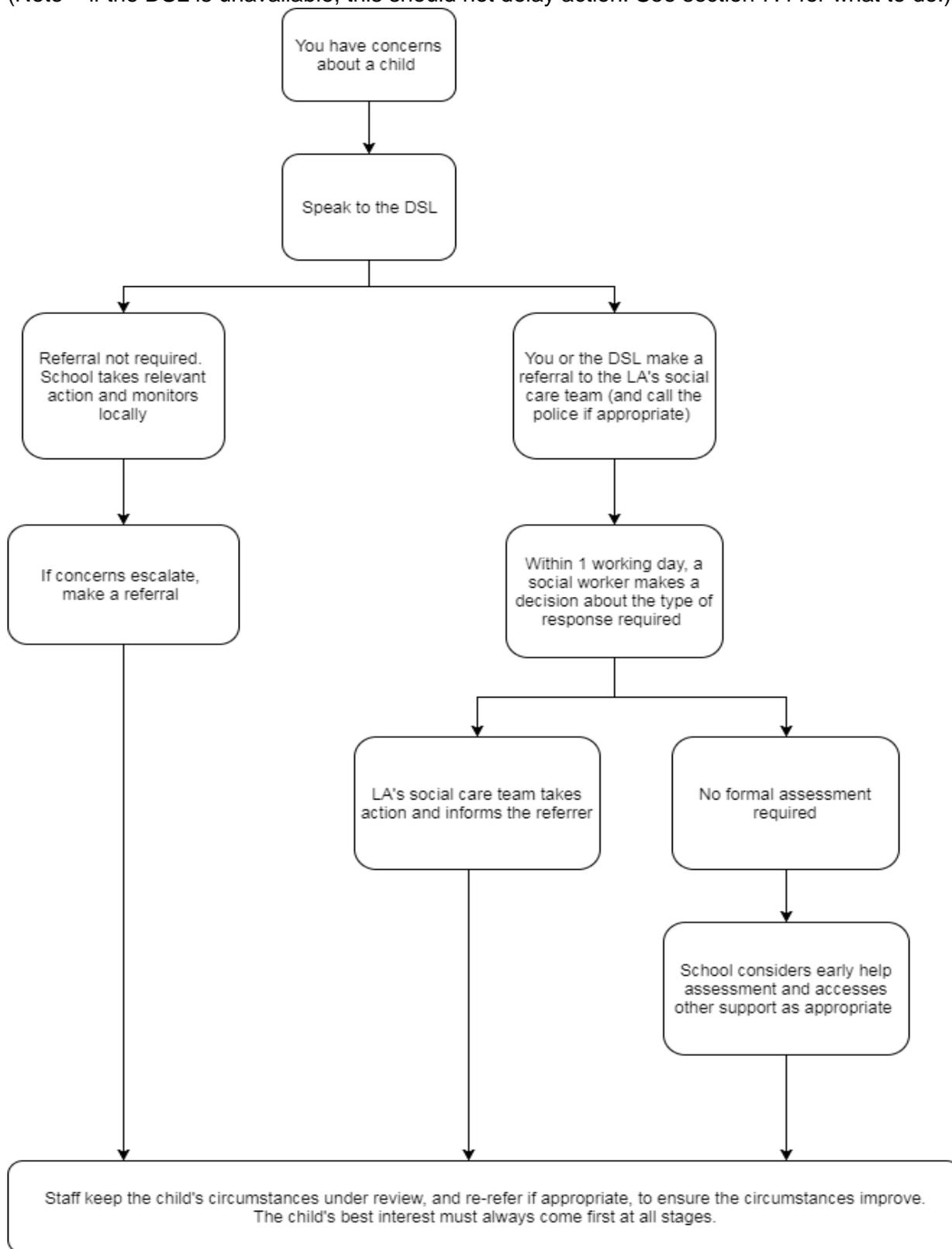
Department for Education guidance on [mental health and behaviour in schools](#)



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Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer or contractor



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If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Independent schools, use:

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the proprietor.

The headteacher/proprietor will then follow the procedures set out in appendix 3, if appropriate.

All schools continue with:

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

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

Is serious, and potentially a criminal offence

Could put pupils in the school at risk

Is violent

Involves pupils being forced to use drugs or alcohol

Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about peer-on-peer abuse.

Procedures for dealing with allegations of peer-on-peer abuse

If a pupil makes an allegation of abuse against another pupil:

You must record the allegation and tell the DSL, but do not investigate it

The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

Procedure for Managing Allegations of Abuse against Adults Working in Education Settings

Employability Solutions Ltd is required to comply with the detailed KSCB Procedure for Managing Allegations against Adults Working in Education Settings. These procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word “staff” is used for ease of description.

Introduction

Employability Solutions Ltd recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative



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that those involved with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

Employability Solutions Ltd recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within Employability Solutions Ltd will do so with sensitivity and will act in a careful, measured way.

Receiving an Allegation

A member of staff who receives an allegation about another member of staff should follow the recommended guidelines for dealing with disclosure.

The allegation should be reported immediately to the staff member with Lead Responsibility, CEO or the Business Manager.

Obtain written details of the allegation from the person who received it, that are signed and dated.

Record information about times, dates, locations and names of potential witnesses.

Initial Assessment

An initial assessment of the allegation, consulting with the staff member with Lead Responsibility / CEO / Business Manager / Senior Post holder or the Local Authority Designated Officer.

An allegation is information, which indicates that a person who works with a child, young person or adult with identified needs has:

- Behaved in a way that has harmed or may have harmed a child or young person.
- Possibly committed a criminal offence against or related to a child or young person.
- Behaved towards a child or young person in a way that indicates s/he is unsuitable to work with children and young people.

It is important that the Designated Senior Person / CEO / Business Manager / Senior Post holder does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

If the assessment of the allegation is that it requires further investigation, then the DSP should refer the matter to the Local Authority Designated Officer (LADO) as soon as possible in accordance with the detailed procedures available from the relevant LADO.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the Employability Solutions Ltd.'s disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

Enquiries and Investigations

Child protection enquiries by Children's Social Care or the Police are not to be confused with internal disciplinary enquiries by the organisation. Employability Solutions Ltd may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the Police, have no power to direct the organisation to act in a particular way; however, Employability Solutions Ltd will assist the agencies with their enquiries.



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Employability Solutions Ltd shall hold in abeyance its own internal enquiries while the formal Police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the Police, the CEO (or Designated Senior Person) / the Head of Education / Student Services Manager or Senior Post Holder should normally be involved in, and contribute to, the inter-agency strategy discussions. The CEO / Business Manager / Designated Senior Person / Senior Post Holder is responsible for ensuring that Employability Solutions Ltd gives every assistance with any agencies enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made and suggest that he/she should consult with a representative, for example, a trade union.

The Head of Education (or Designated Senior Person) will consult with the Police or the LADO particularly in relation to timing and content of the information to be provided, and shall:

1. Inform the student or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
2. Ensure that the parents/carers of the student making the allegation have been informed verbally and in writing that the allegation has been made and what the likely process will involve and are regularly updated at each stage or at regular intervals.
3. Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve. The Business Manager or DSP shall keep a written record of the action taken in connection with the allegation.

Suspension of Staff

Suspension should not be automatic. In respect of staff, other than the CEO or Senior Post Holders, suspension can only be carried out by a nominated Senior Post Holder. In respect of the CEO or Senior Post Holders, suspension can only be carried out by one of the Board of Directors.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and will normally be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

1. Where a student is at risk.
2. Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
3. Where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

If the Police are engaged in an investigation, the Officer in charge of the case should be kept up to date.



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The member of staff should be advised to seek the advice and / or assistance of his / her trade union and should be informed that they have the right to be accompanied by a work colleague or trade union representative. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension.

The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response.

If a Senior Post Holder considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within one working day.

Where a member of staff is suspended, Business Manager/ Senior Post Holder or Designated Senior Person should address the following issues:

1. The CEO should receive reports from the Business Manager detailing any suspensions.
2. Where the CEO has been suspended, the Board of Directors will need to take action to address the management of the organisation.
3. The parents / carers of the student making the allegation should be informed of the suspension and should be asked to treat the information as confidential. Consideration should be given to informing the student making the allegation of the suspension.
4. Senior staff who need to know of the reason for the suspension should be informed.
5. Depending on the nature of the allegation, the CEO should consider with the Designated Senior person whether a statement to the students and / or parents / carers should be made, taking due regard of the need to avoid unwelcome publicity.

The Senior Post Holders / CEO / Business Manager/ Designated Senior Persons shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO and external investigating authorities should be consulted and updated.

The suspended member of staff should be given appropriate support during the period of suspension. He / she should also be provided with information on progress and developments in the case at regular intervals.

The suspension should remain under review in accordance with the organisations disciplinary procedures.

The Disciplinary Investigation

The disciplinary investigation, if deemed necessary, should be conducted in accordance with the existing organisation disciplinary procedures. The member of staff should be informed of:

- The disciplinary charge against him/her.
- His/her entitlement to be accompanied or represented by a trade union representative or work colleague.



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Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately, and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling and support at any stage.

The student or students making the allegation, and / or their parents / carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the member of staff returning to work at the organisation, wherever possible (if suspended).

The Senior Post Holders / CEO (or Designated person) should give consideration to what information should be made available to the general population of the organisation.

Allegations without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept, and consideration given to a referral to the Children's Social Care in order that other agencies may act upon the information.

In consultation with Senior Post Holders / Business Manager, and/or DSP, will contact the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken.

Consideration should be given to offering counselling and support in order to rebuild the member of staff's confidence.

Inform the parents / carers of those involved that the allegation has been made and of the outcome.

Where the allegation was made by a student other than the alleged victim, consideration to be given to informing the parents/carers of that student.

Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

In some circumstances, consider the broader disclosure of details of the outcome of the investigations, for example if the matter is of general importance, has become common knowledge or the subject of general gossip. There is a need to provide accurate details for public information.

Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he / she should be informed about the Organisations statutory duty to notify the Disclosure and Barring Service (DBS).

Monitoring Effectiveness

Where an allegation has been made against a member of staff, the staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are



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any matters arising from it that could lead to the improvement of the organisations procedures and/or policies and/or which should be drawn to the attention of the CEO. Consideration should also be given to the training needs of staff.

Creating a supportive environment in school and minimising the risk of peer-on-peer abuse

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

Ensure staff reassure victims that they are being taken seriously

Ensure staff are trained to understand:

- How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
- That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

7.9 Sharing of nudes and semi-nudes (‘sexting’)

This is a suggested approach based on [guidance from the UK Council for Internet Safety](#) for [all staff](#) and for [DSLs and senior leaders](#).

Your responsibilities when responding to an incident

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

You must **not**:

View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

Delete the imagery or ask the pupil to delete it

Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)

Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

Say or do anything to blame or shame any young people involved

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

Initial review meeting



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Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

Whether there is an immediate risk to pupil(s)

If a referral needs to be made to the police and/or children's social care

If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

What further information is required to decide on the best response

Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

Whether immediate action should be taken to delete or remove images or videos from devices or online services

Any relevant facts about the pupils involved which would influence risk assessment

If there is a need to contact another school, college, setting or individual

Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

The incident involves an adult

There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

The imagery involves sexual acts and any pupil in the images or videos is under 13

The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through a safer schools officer, a police community support officer, local neighbourhood police, dialing 101].

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

What it is

How it is most likely to be encountered

The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

Issues of legality



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The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

Specific requests or pressure to provide (or forward) such images

The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

Put systems in place for pupils to confidently report abuse

Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils

Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Your reporting systems for pupils, e.g. what it looks like for pupils in terms of who they should report concerns to

Pupils are visually and verbally made aware of the different avenues available to them regarding the reporting of any safeguarding concern they may have, or disclosure they may need to make.

How you make pupils aware of the reporting systems and processes, e.g. through discussion in your relationship/sex education curriculum

There are posters and displays in school giving all of the relevant information and points of contact, and discussions regarding how these will be handled are held through PSHE and SRE.

How pupils will feel safe in submitting any concerns, e.g. reassurances provided following disclosures

Staff receive regular training in all areas of safeguarding and follow a Therapeutic Schools approach to support our young people.

8. Online safety and the use of mobile technology

Policies on online safety and the use of mobile and smart technology are reflected in our child protection and safeguarding policy.

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

To address this, our school aims to:

Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors

Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

Set clear guidelines for the use of mobile phones for the whole school community

Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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



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Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

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

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

Communication barriers and difficulties in managing or reporting these challenges



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We offer extra pastoral support for these pupils. This includes:

As an establishment that offer provision for Sen, EHCP and previously NEET and non-attending students, we offer a variety of different support to our young people, based on their specific and bespoke needs as listed in EHCPs, external agency reports and reviewed as required.

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

Responding to unauthorised absence or missing education where there are known safeguarding risks

The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

Independent schools

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSL has details of children's social workers and relevant virtual school heads

We have appointed an appropriately trained teacher, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

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

13.2 Other complaints

Child protection enquiries by Children's Social Care or the Police are not to be confused with internal disciplinary enquiries by the organisation. Employability Solutions Ltd may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the Police, have no power to direct the organisation to act in a particular way; however, Employability Solutions Ltd will assist the agencies with their enquiries.

Employability Solutions Ltd shall hold in abeyance its own internal enquiries while the formal Police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the Police, the CEO (or Designated Senior Person) / the Head of Education / Student Services Manager or Senior Post Holder should normally be involved in, and contribute to, the inter-agency strategy discussions. The CEO / Business Manager / Designated Senior Person / Senior Post Holder is responsible for ensuring that Employability Solutions Ltd gives every assistance with any agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made and suggest that he/she should consult with a representative, for example, a trade union.



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The Head of Education (or Designated Senior Person) will consult with the Police or the LADO particularly in relation to timing and content of the information to be provided, and shall:

Inform the student or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.

Ensure that the parents/carers of the student making the allegation have been informed verbally and in writing that the allegation has been made and what the likely process will involve and are regularly updated at each stage or at regular intervals.

Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve. The Business Manager or DSP shall keep a written record of the action taken in connection with the allegation.

13.3 Whistleblowing

The Whistleblowing policy is available for reference on the company website.

14. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

A clear and comprehensive summary of the concern

Details of how the concern was followed up and resolved

A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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

Further information about safeguarding record-keeping arrangements:

Records are now electronic, however on the occasions that these are created in a paper-based format, these are scanned on to the electronic recording system. All paper-based copies and records – including those sent from previous providers, are stored in locked cabinets only accessible to the DSL team

This information is retained in line with government guidance, unless required to be passed to the next educational provider.

We share information with relevant parties, external agencies are required and within the set government guidance.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff



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15. Training

15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning

Be in line with advice from the 3 safeguarding partners

Have regard to the Teachers' Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils

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

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

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

Volunteers will receive appropriate training, if applicable.

15.2 The DSL deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

15.4 Recruitment – interview panels

(Note: the following practice is a requirement for maintained schools and pupil referral units but is considered good practice for all schools.)

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

Employability Solutions Ltd aims to attract, reward and retain the best available people and to make the maximum possible use of the abilities of all its employees whilst ensuring it safeguards and promotes the welfare of young people and adults with additional needs receiving education and training at the organisation or in the workplace.

In accordance with legislation and guidance, Employability Solutions Ltd has a comprehensive Safer Recruitment Policy and Procedure together with separate policies and procedures in respect of recruitment of ex-offenders and the Disclosure and Barring Service (DBS).

All staff and volunteers are now required to complete an enhanced DBS disclosure prior to commencement of employment or voluntary work with the organisation if they are to have "regulated activity" and will only be permitted to have supervised access to young people and vulnerable adults until clearance has been received.

At least one member of a recruitment panel will have completed Safer Recruitment Training.



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15.5 Staff who have contact with pupils and families

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

16. Monitoring arrangements

This policy will be reviewed **annually** by Nadia Miller – Lead Designated Safeguarding and Eve Bartlet – Executive Headteacher and Deputy Designated Safeguarding. At every review, it will be approved by the full governing board.

17. Links with other policies

This policy links to the following policies and procedures:

Behaviour

Staff [behaviour/code of conduct]

Complaints

Health and safety

Attendance

Online safety

Mobile phone use

Equality

Relationships and sex education

First aid

Curriculum

Designated teacher for looked-after and previously looked-after children

Privacy notices

Whistleblowing

IT Acceptable Use

Anti-bullying.



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

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

Seeing or hearing the ill-treatment of another

Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

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

Once a child is born, neglect may involve a parent 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 caregivers)

Ensure access to appropriate medical care or treatment

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

DEFINITION OF A CHILD

A child is classified as someone who has not yet reached their 18th birthday. This may be amended if an individual is recognised as having "additional needs".

INDIVIDUALS WITH ADDITIONAL NEEDS



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In accordance with the Vetting and Barring Scheme, the term vulnerable adults is no longer used in safeguarding and safer recruitment terms. These are based on individual roles within a setting, e.g. in education teaching, training, supervising children or providing Information, advice or guidance is classed as regulated activity and as such Enhanced Disclosure with a check against the Barred list is required in all cases. Regulated activity working with adults with particular needs is determined by the level of need and risk assessment. Examples of regulated activity linked to services provided include:

- Providing health care by a health care professional
- Providing personal care where an individual requires basic needs
- Providing social work meaning a Social Worker
- Transporting adults with additional needs to health care appointments

There is a greater focus on individual roles and further guidance is available from the Vetting and Barring Scheme.

HIGH NEEDS FUNDED (HNF)

In relation to recent SEND Legislation a number of students with a high level of additional needs may be named as HNF. These will have an Educational Health Care Plan (EHCP).

BRITISH VALUES AT EMPLOYABILITY SOLUTIONS LTD

British Values are of significant importance to everyone involved in any of the organisations activities. We consider Employability Solutions Ltd values and British values forming the basis of citizenship in our community and across a diverse Great Britain.

We promote all these values to our students and staff, and they are embedded in all areas of activity.

In 2014/15, the Department of Education published guidance on promoting British Values in Schools and Colleges to ensure that young people leave school and college well prepared for life in modern Britain. The five-part definition of British values is as follows:

- Democracy
- The Rule of Law
- Individual Liberty
- Mutual Respect
- Tolerance of different faiths and beliefs

Employability Solutions has its own values:

- Respect for yourself, each other, and the environment
- Welcoming, honest, and open
- Safe and supportive culture
- Inspiring students and staff
- Positive and dynamic attitude

With all these values in mind we aim to:



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- Help students become more valuable members of society who treat others with respect and tolerance regardless of background.
- Promote and respect British and Employability Solutions Ltd values with mutual respect and tolerance for everyone
- Celebrate and promote equality, diversity, and inclusion



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Appendix 2: safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

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

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

Advertising

When advertising roles, we will make clear:

Our school's commitment to safeguarding and promoting the welfare of children

That safeguarding checks will be undertaken

The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children

Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

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

Consider any inconsistencies and look for gaps in employment and reasons given for them

Explore all potential concerns

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

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

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

Sign a declaration confirming the information they have provided is true

Seeking references and checking employment history

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

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate



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- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

Explore any potential areas of concern to determine the candidate's suitability to work with children

Record all information considered and decisions made

Pre-appointment vetting checks

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

New staff

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

Verify their identity

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

Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

Verify their mental and physical fitness to carry out their work responsibilities

Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

Verify their professional qualifications, as appropriate

Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:

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

Academies, including free schools, and independent schools

Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

Regulated activity means a person who will be:

Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

There are concerns about an existing member of staff's suitability to work with children; or

An individual moves from a post that is not regulated activity to one that is; or

There has been a break in service of 12 weeks or more

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

We believe the individual has engaged in [relevant conduct](#); or



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We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

An enhanced DBS check with barred list information for contractors engaging in regulated activity

An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors – Claire Cook

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

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

The chair of the board will have their DBS check countersigned by the secretary of state.

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

A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]

Identity

Right to work in the UK

Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings



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

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.



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Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education

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

Behaved in a way that has harmed a child, or may have harmed a child, and/or

Possibly committed a criminal offence against or related to a child, and/or

Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or

Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors [in independent schools: proprietor] where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved

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

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

Redeployment within the school so that the individual does not have direct contact with the child or children concerned

Providing an assistant to be present when the individual has contact with children

Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted

Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the group

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

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

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

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

Procedure for dealing with allegations

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

Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below

Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk



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to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Further support and advice can be sought from HR and the Staff Well-being officer

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child. If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

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

Additional considerations for supply teachers and all contracted staff

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

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required



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We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

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

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days

If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

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



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

Record-keeping

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

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

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

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

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

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

References

When providing employer references, we will:

Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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



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Concerns may arise through, for example:

Suspicion

Complaint

Disclosure made by a child, parent, or other adult within or outside the school

Pre-employment vetting checks

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

Definition of low-level concerns

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

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

Being overly friendly with children

Having favourites

Taking photographs of children on their mobile phone

Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

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

We will create this culture by:

Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

Empowering staff to share any low-level concerns as per section 7.7 of this policy

Empowering staff to self-refer

Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

Providing a responsive, sensitive and proportionate handling of such concerns when they are raised

Helping to identify any weakness in the school's safeguarding system

Making sure that all stakeholders are aware of the reporting procedures for safeguarding in relation to sharing concerns and disclosures, and that every concern is treated seriously.

Responding to low-level concerns

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

Directly to the person who raised the concern, unless it has been raised anonymously

To the individual involved and any witnesses

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

Record keeping

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

Records will be:

Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

Retained at least until the individual leaves' employment at the school

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



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References

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

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance



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Appendix 4: specific safeguarding issues

Children missing from education

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

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

CHILDREN WITH FAMILY MEMBERS IN PRISON

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

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late



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Regularly missing school or education
Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

OPERATION ENCOMPASS

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school have up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

NATIONAL DOMESTIC ABUSE HELPLINE

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day 0808 2000 247. Its website provides guidance and support for potential victims, as well as those



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who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the Designated Safeguarding Lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation. For more information please see <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

So-called 'honour-based' abuse (including FGM and forced marriage)

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

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

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE



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- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

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

Forced marriage

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

Terrorism is an action that:

- Endangers or causes serious violence to a person/people.
- Causes serious damage to property; or



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- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

The Prevent Duty

All schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76 which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

The DfE has published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support. Please see: <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

Channel



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Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn onto terrorism and consider appropriate support required. A representative from the college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Forces that may contribute to vulnerability:

- Rejected by peer, faith or social group/family.
- Pressure from persons linked to extremism.
- Victim or witness to race or religious hate crime.
- Conflict with family over religious beliefs/lifestyle/politics.
- Identify confusion.
- Recent religious conversion.
- Change in behaviour or appearance due to new influences.
- Under-achievement.
- May possess literature related to extreme views.
- Experience of poverty, disadvantage, or social exclusion.
- Extremist influences.
- A series of traumatic events – global, national, or personal.

Spiritual/Faith Abuse

Within certain faith communities harm can be caused by the inappropriate use of religious belief or certain practices. This can include the misuse of the authority of leadership, penitential discipline, oppressive teaching, or intrusive healing and deliverance ministries which may result in either children, young people or those with additional needs experiencing harm. This may include attempts to direct or coheres individuals what to believe and deny them choice.

Peer-on-peer abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

Abuse in intimate personal relationships between peers

Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

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

Consensual and non-consensual sharing of nudes and semi nudes' images and/or videos (also known as sexting or youth produced sexual imagery)

Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.



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If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

Between 2 children of any age and sex

Through a group of children sexually assaulting or sexually harassing a single child or group of children

Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

Challenging inappropriate behaviours

Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

What Is Sexual Violence and Sexual Harassment?

Sexual Violence

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

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

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

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

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.



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Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

This may include:

- Non-consensual sharing of sexual images and videos.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including, on social media; and
- Sexual exploitation; coercion and threats; and
- Upskirting

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12th April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now criminal offence. Anyone of any gender can be a victim.

The response to a report of sexual violence or sexual harassment

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

If staff have a concern about a child or a child makes a report to them, they should follow the referral process, if staff are in any doubt as to what to do, they should speak to the Designated Safeguarding Lead (or a deputy).

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

Increased absence from school

Change in friendships or relationships with older individuals or groups

Significant decline in performance

Signs of self-harm or a significant change in wellbeing



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Signs of assault or unexplained injuries

Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

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

Being male

Having been frequently absent or permanently excluded from school

Having experienced child maltreatment

Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

COUNTY LINES

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

A child or young person’s involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a person’s lifestyle should be discussed with them.

Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- persistently going missing from school or home and/or being found out-of-area
- unexplained acquisition of money, clothes, or mobile phones
- excessive receipt of texts/phone calls and/or having multiple handsets
- relationships with controlling/older individuals or groups
- leaving home/care without explanation
- suspicion of physical assault/unexplained injuries
- parental concerns
- carrying weapons
- significant decline in school result/performance



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- gang association or isolation from peers or social networks
- self-harm or significant changes in emotional well-being

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

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

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

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

Non-collection of children

If a student who should be collected is not collected at the end of the session/day, we will:

- Contact home / adult with parental responsibility to find out the reasons for non-collection
- Arrange for the responsible adult to collect them
- Record the incident on the EduSpot MIS system.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

All academic staff are asked to complete registers and follow up unauthorised absences following the relevant policy and procedure. Where there are immediate concerns for a missing person the DSP is contacted, who will take control and liaise with all involved.

Other sources of information are available including Departmental advice.

- What to do if you are worried a child is being abused. Advice for Practitioners

Also, the NSPCC website provides useful additional information.

www.nspcc.org.uk

MENTAL HEALTH

Mental health problems can in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into



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adulthood. It is key that staff are aware of how these children’s experiences can impact on their mental health, behaviour, and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however:

- Are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one
- Are to report a mental health concern about a child that is also a safeguarding concern by following the school child protection policy and speaking with the designated safeguarding lead or deputy

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. **All** staff, but especially the Designated Safeguarding Lead (and Deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children/young people should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare. Children’s social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Type of Harm to Vulnerable People	Meaning	Examples
Emotional / Psychological	Action or inaction by others that cause mental anguish	Inflexible regimes and lack of choice. Mocking, coercing, denying privacy, threatening behaviour, bullying, intimidation, harassment, deliberate isolation and deprivation.
Financial	Usually associated with the misuse of money, valuables or property	Unauthorised withdrawals from vulnerable adult’s bank account, theft, fraud, exploitation, pressure in connection with wills or inheritance.
Physical	Any physical contact that results in discomfort, pain or injury	Hitting, slapping, pushing, shaking, bruising, failing to treat sores or wounds, under or overuse of medication, un-prescribed or inappropriate medication, use of restraint or inappropriate restraint and inappropriate sanctions.
Sexual	Coercion or force to take part in sexual acts	Inappropriate touching. Causing bruising or injury to the anal, genital or abdominal area. Transmission of STD.
Neglect	Failure to identify and/or meet care needs	Untreated weight loss, failing to administer reasonable care resulting in pressure sores or uncharacteristic problems with continence. Poor hygiene, soiled clothes not changed,



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		insufficient food or drink, ignoring resident's requests, unmet social or care needs.
Verbal	Any remark or comment by others that causes distress	Demeaning, disrespectful, humiliating, racist, sexist or sarcastic comments. Excessive or unwanted familiarity, shouting, swearing and name calling.

GLOSSARY OF TERMS, ROLES AND RESPONSIBILITIES

Local Authority Designated Officer (LADO)	LADO is responsible for the management and oversight of all allegation cases across the city, providing advice and guidance to employers and voluntary organisations, liaison with Police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process. Tel: 01484 226 748
Prevent Team (Kirklees)	Channel referrals can be made to the Prevent Team based in Kirklees. They can be contacted if you have a concern, want to make a Channel referral or want to discuss an open case regarding Prevent and Channel. Channel and Prevent Kirklees Prevent Hub: 01924 483747 Prevent Coordinator – Matt Brayford - 01484 221 000 Channel Coordinator – Daniel Dearnley – 01484 221 000 Prevent Engagement Manager – Alyson CLarkson – 01484 221 000 Email: prevent@kirklees.gov.uk or alysonz.clarkson@kirklees.gov.uk Website referral form: http://www.kirklees.gov.uk/beta/community-safety-partners/making-a-channel-referral.aspx
Independent Reviewing Officer (IRO)	While they are employed by the Children's Services, the IRO team is not attached to another CS team or service. IROs chair strategy meetings and child protection conferences.
School's Safeguarding Service / Safeguarding Unit	School's Safeguarding Co-ordinator and School's safeguarding Officer act as points of contact and a source of advice for any school or setting where a safeguarding or allegations issue arises.
Children's Services (CS)	Children's Services includes, among various other services, Children's Social Care (CSC – formerly Social Services) and the Safeguarding Unit. The Safeguarding Unit is one of a number of non-locality based / centrally managed services and this is where LADO, Senior IRO and School's Safeguarding team are located.
Public Protection Unit (PPU)	Specialist Police teams which consist of detectives trained specifically to deal with child protection cases. PPU officers deal with suspected intra-familial abuse cases and allegations against adults working with children and young people, although they also contain domestic violence and offender-specific officers too.
Kirklees Safeguarding Children Board (KSCP)	The KSCP has responsibility for ensuring there are effective inter-agency procedures in place for dealing with allegation against people who work with children and for monitoring and evaluating these.



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	Mezzanine Floor, Brian Jackson House, 2 New North Parade, Huddersfield, HD1 5JP Tel: 01484 225 218 Email: KSCBAdmin@kirklees.gov.uk
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Appendix 8



RED FLAG FORM

SECTION 1

Name(s) of Person of Concern	
DOB	
What is the nature of your concern	
<ul style="list-style-type: none"> • WHAT are you most concerned about? i.e. Prevent (extremism, physical, sexual, emotional abuse or neglect? Self-Harm, bullying, sexual exploitation, sexualized behaviour, honour-based violence/forced marriage, e-safety issues, other.... • Any evidence of impairment of health or development? • Any evidence of ill-treatment? • WHY are you reporting this concern <u>now</u>? • Have you had any previous concerns about this learner? If so, WHAT, WHEN, ACTION? • Please include WHO was present, WHEN disclosure was made and who is said to be involved • WHERE is it said to have happened? 	
Detail	
Any action already taken	
Signed	
Name	
Job Title	
Date & Time	
Continuation Sheet Attached Yes/No	

NOTE: Differentiate clearly between fact, opinion, interpretation and stick to the facts as you understand them wherever possible! If you have used quotes, please ensure that they are accurate. Make a note of



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RED FLAG FORM

SECTION 2

Designated Safeguarding Person to complete

Name of Designated Safeguarding Person	
Date and Time	

Person of concern's details	
Name	
DOB	
Address	
Sex	
Disability	
Ethnic Origin	
Any other names the person or family members may be known by	
Previous Address	

Please tick relevant boxes

Current Status	Level of Need	Referral made to
CPP	1	Careline/LSCP CAMHS
CIN	2	Adult Services DSL
LAC	3	CSE Channel
CAF/EHAT	4	Police Other
NONE	N/A	Crisis Team

Reason for concern. (Put 1 or 2 to concern) (1 = Primary concern) (2= Secondary concern)

DV (Victim)	Behaviour of Person	Sexual Assault	Parenting
DV (Witness)	Knife Crime	CSE	Neglect
Physical Harm	Gun Crime	Grooming	Sibling
Bullying	Criminality	FGM	Medical
Missing from Education	Extremism/Radicalisation	Forced Marriage	Poverty/Debt
Substance Misuse	Hate Crime	Mental Health	Housing
		Gang & Youth	



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RED FLAG FORM

Has there been any significant changes in the person's behaviour or presentation

Detail and actions taken

Knowledge of concerns

Is the person aware of the disclosure/concern? Yes / No

If Yes, what was their response to the disclosure/concern?

Any other relevant information

Is there anything else you feel should be recorded?

Names of anyone spoken to:	Contact details:

DSP Name (printed)	DSP Signature	Date	
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RED FLAG FORM

REPORTING SAFEGUARDING CONCERNS FLOWCHART

