

# SAFEGUARDING CHILDREN



## CHILD PROTECTION POLICY

### APPLIES TO THE WHOLE SCHOOL

Approved by:	Signed and dated:
<b>Designated Safeguarding Lead:</b> Carly Riddoch	 1st September 2022
<b>Head Teacher:</b> Charlotte Crookes	 1st September 2022

***This Policy which applies to the whole school inclusive of the Early Years Foundation Stage (EYFS) is publicly available on the School's website and upon request a copy (which can be made available in large print or other accessible formats if required) may be obtained from the School Office.***

This policy was last reviewed and agreed by the Head Teacher of the school in Sep 2022 and will next be reviewed no later than Sept 2023 or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require. The child protection policy forms the first pages of this document. The appendices follow. However, the inspectorate requires us to number all pages consecutively and not to have the appendices as separate documents. We have separate comprehensive document Safer Recruitment and Staff Selection, Sexual Violence and Sexual Harassment (child on child abuse), and Relationships and Sex Education.

# **Table of Contents**

[INTRODUCTION](#)

[MAIN ELEMENTS OF OUR SAFEGUARDING POLICY \(PREVENT, PROTECT, SUPPORT\)](#)

[KEY INTERNAL CONTACT DETAILS](#)

[KEY EXTERNAL CONTACT DETAILS](#)

[SAFER RECRUITMENT; SINGLE CENTRAL REGISTER; VISITORS AND VISITING SPEAKERS; PREVENTING](#)

[STAFF TRAINING](#)

[SPECIFIC SAFEGUARDING ISSUES AND INDICATORS](#)

[SEQUENCE OF EVENTS TO BE FOLLOWED WHEN A YOUNG PERSON DISCLOSES ABUSE OR YOU HAVE A CONCERN ABOUT A CHILD](#)

[ALLEGATIONS AGAINST STAFF, SUPPLY STAFF, VOLUNTEERS, CONTRACTORS, DSLs AND THE GOVERNING BODY \(INCLUDING LOW-LEVEL CONCERNS\)](#)

[ABUSE OF ONE OR MORE PUPILS ON ANOTHER PUPIL; SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN](#)

[PREVENT DUTY: TEACHING PUPILS HOW TO KEEP SAFE INCLUDING THE DELIVERY OF PREVENT STRATEGY AND SMSC \(SPIRITUAL, MORAL, SOCIAL AND CULTURAL\) DEVELOPMENT](#)

[SAFEGUARDING VULNERABLE PUPILS INCLUDING: DISABLED CHILDREN, PUPILS WITH MEDICAL CONDITIONS, EYFS, LGBT AND LOOKED AFTER CHILDREN](#)

[PUPIL MENTAL HEALTH](#)

[CHILDREN MISSING EDUCATION](#)

[CONFIDENTIALITY, INFORMATION SHARING AND WHISTLEBLOWING](#)

[ADDITIONAL SAFEGUARDING ISSUES RELATING TO THE POINTER SCHOOL](#)

# INTRODUCTION

***Safeguarding is the golden thread that runs through every aspect of the school. Good safeguarding requires a continuing commitment from governing bodies, senior leaders and all staff to ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures, and consequently enshrined in its ethos. (KCSIE 2022)***

Safeguarding is everyone's responsibility. All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. All staff are required to sign that they read, understood and will abide by our 'Child Protection Policy', 'KCSIE part one' and for those who work directly with children 'KCSIE Annex B' along with our Safer Recruitment Policy, Whistleblowing Policy, Staff Behaviour policy (Staff Code of Conduct) and The Teachers' Standards. The school takes a risk-based approach to requiring agency staff and volunteers to read this information, and all volunteers and agency staff are provided with information about the school's safeguarding procedures and arrangements.

Our approach is child-centred and at all times, we will act in **the best interests** of the child. This policy takes full account of the child protection procedures agreed by the London Royal Borough of Greenwich Safeguarding Children Partnership, along with the [Prevent Duty Guidance](#) (2021) and [Keeping Children Safe in Education \(KCSIE\)](#) (DfE: September 2022). This policy takes full account of the statutory guidance [Working Together to Safeguard Children](#) (HM Govt: 2018 as amended February 2020) and also takes account of statutory Government guidance document [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education guidance](#) (2021) released under Section 80A of the Education Act 2002 and Section 403 of the Education Act 1996.

The Pointer School recognises it is an agent of referral and not of investigation. Any person may make a referral (including whistleblowing) to external agencies such as the London Royal Borough of Greenwich Safeguarding Children Partnership or Local Authority Designated Officer (LADO) and the police, if necessary. The Pointer School allows access for children's social care from the host local authority and from the local authorities where the children reside in undertaking their safeguarding (Child Protections) duties.

This policy provides staff, volunteers and the The Governing Body with the guidance they need in order to keep children safe and secure in our school and informs parents and guardians how we will safeguard their children whilst they are in our care. The Pointer School promotes safe practice and professional conduct to safeguard children and to mitigate against the potential for misunderstandings or situations being misconstrued so teachers and other staff are not vulnerable to allegations. Our staff maintains an attitude of 'it could happen here' as far as safeguarding is concerned. We understand the importance of children receiving the right help at the right time to address risks and prevent issues escalating.

**Monitoring and review:** This policy is subject to continuous monitoring, refinement and audit by Mark Bailey (safeguarding Governor) and Charlotte Crookes (Head Teacher) as well as the Designated Safeguarding Lead (Carly Riddoch) and Deputy Designated Safeguarding Lead (Annabel Turner). The external supervision of the DSL and DDSL is by the Governance Board. The Governors will undertake a full annual review of safeguarding, including this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. The Annual Review also covers staff training (including safeguarding, DSL,

Induction and safer recruitment), details of referrals and allegations against staff that have been made throughout the previous academic year, and also any upcoming training needs. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed policy and it is made available to them in either a hard copy or electronically on the staff teacher drive.

**Definition of safeguarding from *Keeping Children Safe in Education (KCSIE)* (DfE: September 2022):** This is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Children include everyone under the age of 18.

**The Difference between Safeguarding and Child Protection:** Safeguarding is a broader term than child protection. It encompasses all the elements set out above and is what a School should do for all its pupils; Child Protection is part of this definition and refers to activities undertaken to protect children who have been harmed or are at significant risk of being harmed. Where a child is thought to be suffering significant harm, or to be at risk of suffering significant harm, this must be reported to MASH immediately. Action must also be taken to promote the welfare of children who are believed to be in need of additional support, even if they are not suffering harm or at immediate risk. Such instances should be addressed through inter-agency assessment using local processes. Harm can include ill treatment that is not physical as well as the impact of witnessing ill-treatment of others (eg the impact on children of all forms of domestic abuse).

**Thresholds for Intervention:** If staff have any concerns about a child's welfare, they should act on them immediately, following the procedures set out in this policy. Interventions may include:

- managing any support for the child internally via the school or college's own pastoral support processes; an early help assessment; or
- a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.

**Early Help:** In the first instance staff should discuss early help requirements with our DSL. The DSL will lead on liaising with other agencies and in setting up an inter-agency assessment as appropriate Staff may be required to support other agencies and professionals in an Early Help Assessment. The role of Early Help in our school allows our pupils to be supported at any point in their life by a range of external support agencies enabling potential concerns to be addressed to prevent further problems arising or before a child may come into immediate danger. It is the aim of targeted Early Help Services, arranged by the local authority, to address the assessed needs of a child and their family, which focuses on activity to significantly improve the outcomes for the child. Our staff are, in particular, alert to the potential need for early help for a child who:

- is disabled and has specific additional needs; has special educational needs (with an EHCP or not);
- is showing signs of engaging in antisocial or criminal behaviour, including gang involvement and association with organised crime groups; is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves; is at risk of modern slavery, trafficking or exploitation;
- is a young carer; is in a family presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence; is at risk of being radicalized or exploited; is a privately fostered child.
- has returned home to their family from care and/or is showing early signs of abuse and/or neglect.

After gaining consent from the child/family to share information gathered from discussions, relevant professionals will be invited to come together in a 'Team around the Child' (TAC) to assess the child's needs and decide with the child/family a course of action to provide the services needed. A TAC is a multi-disciplinary team of practitioners established on a case-by-case basis to support a child and their family.

**MASH referral for 'Significant harm':** Sometimes, a single traumatic event may constitute Significant Harm. In other circumstances Significant Harm is caused by the cumulative effect of significant events, both acute and long-standing, or the damaging impact of neglect, which interrupt and change or damage the child's physical

and psychological development. Children's Social Care will always seek to work in partnership with the family, but if, upon receiving the referral, if the Social Care Manager believes that there is good evidence that a child is at risk of significant harm, a social practitioner can investigate without the agreement of the family. A referral to Social Care under these circumstances does not always result in a social care intervention.

# MAIN ELEMENTS OF OUR SAFEGUARDING POLICY (PREVENT, PROTECT, SUPPORT)

The main elements to our school's safeguarding policy are:

- **Prevention:** We safeguard children whether they are at risk of maltreatment or abuse or in need of specific local authority or inter-agency care. Our safer recruitment procedures include checking and recording the suitability of staff and volunteers developing procedures to deal with safeguarding issues which may be specific to individual children in our school and local area. We work with other agencies to reduce risk and promote the welfare of pupils.
- **Protection:** Staff are trained and supported to respond appropriately and sensitively to all safeguarding concerns following our agreed procedures. We identify and act on early signs of abuse, neglect and reassess concerns when situations do not improve to ensure the right help at the right time to address risks and prevent risks escalating. We ensure that allegations, concerns, suspicions and complaints against staff are dealt with promptly, and in accordance with DfE and local guidance. We keep accurate records and share relevant information quickly in order to challenge inactivity. Additionally, we take all practical and appropriate steps to ensure that our school premises are as secure as circumstances permit.
- **Support:** We support children who may have been at risk of significant harm (which includes the way staff respond to their concerns and any work that may be required) or children who have been abused, in accordance with their agreed Child Protection Plan. We seek to address both the mental and emotional welfare of children and families through: the provision of individual counselling, providing a positive and safe school environment, careful and vigilant teaching, accessible pastoral care, good adult role models and by promoting full cooperation with and contributions to the provision of appropriate coordinated support and/or early help from external agencies. Additionally, we operate robust and sensible health and safety procedures, along with clear and supportive policies on drugs, alcohol and substance misuse. We recognise that children have a right to feel secure and are unable to learn effectively unless they do so. Any adult can harm a child either by direct acts or failure to provide proper care, or both. This may be through neglect, emotional, physical or sexual abuse or a combination of such types.

Our children have the right to respect and protection from abuse, regardless of age, gender (including transgender), ability, language, religion, race, nationality, sexuality, culture or disability. They have the right to feel valued and confident, knowing how to approach adults if they are in difficulty. In our school a bullying incident is treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Our safeguarding Child Protection Policy is also dovetailed with the Behaviour Management and Anti-bullying Policies. Whilst the school will work openly with parents as far as possible, the school reserves the right to contact Children's Services or the Police, without notifying parents if this is in the child's best interests. In preparing this policy, we have been attentive to the nature, age range and other significant features of the school in the provisions made for safeguarding. We are aware of the potential scope for problems relating to emotional health issues, body image, eating disorders, self-harm, and also radicalisation and extremism. In the early years setting, staff are required to look beyond the setting in order to understand and respond to the needs of young children.

# KEY INTERNAL CONTACT DETAILS

**Our School's Designated Safeguarding Lead (DSL)/Prevent Officer and the Deputy DSL/Deputy Prevent Officer** have lead responsibility for child protection and are also the Prevent Officer and Deputy Prevent Officer responsible for the prevention of radicalisation, extremism and being drawn into terrorism. The DSL is a member of the Senior Leadership Team (SLT) and has the status and authority within the school to carry out the duties of the post. This includes child protection referrals, raising awareness, training, liaising with the local authority children's agencies as appropriate, committing resources and supporting and directing staff. Their telephone numbers are prominently displayed in the school.

## Safeguarding Team

### Designated Safeguarding Lead (DSL)

Including the EYFS, Prevent Officer for the whole school and Designated Teacher for Children in Care (Looked After Children):

Miss Carly Riddoch (Deputy Head Pastoral) - Based at Upper School  
PH: [02082931331](tel:02082931331) E: [carly.riddoch@pointers-school.co.uk](mailto:carly.riddoch@pointers-school.co.uk)



### Deputy Designated Safeguarding Lead (DDSL)

Including the EYFS, Deputy Prevent Officers, who liaise with local statutory children's agencies as appropriate

Miss Annabel Turner (Deputy Head Academic) - Based at Upper School  
PH: [02082931331](tel:02082931331) E: [annabel.turner@pointers-school.co.uk](mailto:annabel.turner@pointers-school.co.uk)



**Safeguarding concerns should always be reported to the DSL or DDSL first. If Carly or Annabel are not available, the following staff are DSL trained and can give you interim advice.**

Mrs Mirielle Dirx - Based at The Upper School  
[mdirx@pointers-school.co.uk](mailto:mdirx@pointers-school.co.uk)



## Staff responsible for the overall safeguarding of the school

Mrs Charlotte Crookes  
Head Teacher



[ccrookes@pointers-school.co.uk](mailto:ccrookes@pointers-school.co.uk)

Mr Mark Bailey  
Safeguarding Governor



[mark.bailey@dukeseducation.com](mailto:mark.bailey@dukeseducation.com)

# KEY EXTERNAL CONTACT DETAILS

The Local Authority Designated Officers (LADO), Laura Lumbis, and Child Protection Team Manager are familiar with our methods and procedures, and with whom good lines of communication are kept. Her contact details are:

Telephone: **07896781040** Email: [childrens-LADO@royalgreenwich.gov.uk](mailto:childrens-LADO@royalgreenwich.gov.uk)

**During an out of hours emergency**

Telephone: **020 8854 8888** Email: [Childrens-Out-Of-Hours@royalgreenwich.gov.uk](mailto:Childrens-Out-Of-Hours@royalgreenwich.gov.uk)

**If the LADO is not available, you may also contact**

- Winsome Collins (0208 921 4472);
- Sharon Pearson (0208 921 4493)
- School Safeguarding Officer Rachel Walker (0208 921 2206.)

*Keeping Children Safe in Education* (Department for Education (DfE): September, 2022) makes it clear that anybody can make a direct referral to Greenwich Children's Safeguarding Partnership (GCSP) including the LADO. If a child's situation does not appear to be improving the staff member with concerns should press for reconsideration. Concerns should always lead to help for the child.

**MASH for Children at Risk and Children in Need / Early Help / Intervention and Assessment Services**

Children who have suffered or are likely to suffer significant harm are *children at risk*. Children who are in need of additional support from one or more external agencies are *children in need*.

**Concerns about a child:** if a child has suffered or is likely to suffer significant harm, the DSL must immediately report this to **Children's social care (CSC)**. For Children in need of additional support from one or more agencies, the DSL also refers this to Children's Social Care (CSC) using the inter-agency assessment process (Multi Agency Safeguarding Hub (MASH)) via a referral form, thus utilising the "Team around the Child" (TAC) approaches.

**The contact details for London Borough of Greenwich Children's Social Care Referral and Assessment Team Services, are as follows:**

- Office Hours (9.00am – 5.00pm Monday to Friday) Telephone: 020 8921 3172
- Emergency Duty Team (out of office hours, weekends and Bank Holidays) Telephone: 020 8854 8888

Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

**The Local Authority Prevent Lead for support and advice for the prevention of radicalisation is Adam Browne.** Telephone: 020 8921 8324. The non-emergency police telephone number is: 111 and the Department for Education (DfE) dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk).

**If an adult working in our school has concerns or identifies a pupil as being at risk of radicalisation, the adult should immediately inform our DSL, who is also our Prevent Officer, who will consider the most appropriate referral which could include Channel or Children's Social Care.** Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

**Female Genital Mutilation (FGM):** Alongside speaking to the DSL, it is mandatory for us to report any suspected cases of Female Genital Mutilation to the Police whose contact details are: For non-emergency 101 and for emergency calls 999.. For advice and guidance telephone: 0800 028 3550 or Email: [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk).

**Printed copies of the London Royal Borough of Greenwich Safeguarding Children Partnership procedures are available from the school office and they also can be contacted as follows:**

Referral team (Office Hours) 020 8921 3172 Emergency Duty Team (out of office hours only): 020 8854 8888

**NSPCC Child Protection Helpline:** 0800 028 028 The **NSPCC whistleblowing helpline** is available (8am to 8pm Mon – Fri) for staff that do not feel able to raise concerns regarding child protection failures internally. Alternately, staff can email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) **Childline:** Tel: 0800 1111 [www.childline.org.uk](http://www.childline.org.uk)

**Other useful contacts for this policy:**

**Ofsted** Piccadilly Gate, Store Street, Manchester, M1 2WD Tel: 03001234234 Email: [enquiries@ofsted.gov](mailto:enquiries@ofsted.gov) Web: [www.ofsted.gov.uk](http://www.ofsted.gov.uk)

**Disclosure and Barring Service (DBS)**

Address for referrals: PO Box 181, Darlington, DL1 9FA Telephone for referrals: 01325 953 795 Telephone for customer services: 0870 909 08 Email: [customerservices@dbs.gsi.gov.uk](mailto:customerservices@dbs.gsi.gov.uk)

The local authority area (Greenwich) has now transitioned from a Local Safeguarding Children Board (LSCB) to the Greenwich Safeguarding Children Partnership– this is formed of James (Jim) Foley, Detective Superintendent Southeast BCU of the Metropolitan Police, Florence Kroll, Director of Children’s Services of the Royal Borough of Greenwich, and Yvonne Leese, Deputy Managing Director and Director of Quality of NHS Greenwich CCG. Together with advisors, they will form an Executive Partnership which will be responsible for providing effective, ambitious child-focused leadership within and across partners. Our school is a part of the Schools’ Safeguarding Network, which our DSL engages with on a regular basis through policy updates, email newsletters, and attendance at Greenwich DSL Network meetings.

A new system of child death review partner arrangements is also being put in place. These new systems will feed into the new national Child Safeguarding Practice Review Panel, the role of which will be to promote improvement nationally.

**If a child is in immediate danger or left alone, you should contact the police or call an ambulance immediately on 999.**

**Police Child Abuse Investigation Team – call 101 Police Domestic Abuse Investigation Team – call 101**

For further guidance about when to call the Police, the DSL may wish to reference the [NPCC- When to call the police](#) document.

# SAFER RECRUITMENT; SINGLE CENTRAL REGISTER; VISITORS AND VISITING SPEAKERS; PREVENTING

**All staff and volunteers:** Safeguarding is everyone's responsibility. It applies to all who work, or volunteer, or learn, or supply services to our school. All staff and volunteers have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. This includes a duty to act upon any suspicion, concern or disclosure that may suggest that a pupil is at risk of significant harm or in need of support services. All staff and volunteers should be alert to pupils at risk of being radicalised or drawn into extremism or Child Sexual Exploitation whether from an adult or another pupil.

They are required to report instances of actual or suspected child abuse or neglect to the DSL or Deputy DSL. Additionally they are expected to make themselves available for appropriate training if necessary out of normal school hours and to read both this policy and Part 1 of the latest edition of KCSIE and 'What to do if you are worried a pupil is being abused' latest edition. Special arrangements will be put in place for anyone working in the school whose command of English is insufficient to enable them to read and digest the contents of this policy and Part 1 of KCSIE.

**Safer Recruitment, the Single Central Register (SCR):** (Please also refer to our Safer Recruitment Policy) Our school operates safer recruitment procedures including required pre-appointment checks on teaching and non-teaching staff, volunteers, the Governing Body supply staff, staff of contractors and other individuals working with or nearby pupils. The SCR of appointments is rigorously maintained. Checks are recorded in the SCR by reference to the usual considerations such as role, frequency, supervision, payment and employment by another organisation. All employees, The Governing Body, supply staff, volunteers and others working within the school are checked in accordance with the full requirements of the SCR before starting work and the details of these checks are recorded in the SCR.

Through risk assessments, the school also ensures that appropriate checks have been made upon the staff of other organisations working with our pupils on external trips and visits, including adults who supervise pupils on work experience (career shadowing programme). In any case where the required documentation is unavailable or checks have not been completed prior to the starting date for any member of staff or other adult who may have access to pupils, then a risk assessment will be carried out to determine the appropriate course of action, e.g. allowing appropriately supervised access for a specified period or postponing the starting date.

A curriculum vitae (CV) is only be accepted alongside a full application form and is not sufficient on its own to support safer recruitment. As part of the shortlisting process, schools and colleges should consider carrying out an online search as part of their due diligence on shortlisted candidates to help identify any incidents or issues that have happened, and are publicly available online which the school/college might want to explore with applicants at interview.

**Disqualification Under the Childcare Act 2006 as amended 2018 – (Early Years and Later Years Provision):** Any member of staff, volunteer, or student on placement working with children aged under eight during, pre- or after-school childcare, will be required to self-declare that they are not disqualified under the Childcare Act. We identify and record which staff are covered by this.

**Safeguarding arrangements for staff employed by another organisation:** We ensure procedures are followed to enable appropriate pupil protection (including DBS checks) and are applied to staff employed by other organisations in contact with School (including obtaining written confirmation that DBS checks have been completed). The Pointer School will obtain DBS checks on contractor staff, who also receive safeguarding training from the DSL.

**Visitors and visiting speakers:** Appropriate safeguarding and prevent duty checks upon visiting speakers and other visitors will be made and recorded. All visitors and visiting speakers will be required to undergo an identity check and appropriate DBS check on arrival and wear a visitor's badge. They will not be allowed unsupervised access to pupils. The school keeps a visitors' book at the school office. All visitors must sign in on arrival and sign out on departure and are escorted whilst on school premises by a member of staff or appropriately vetted volunteer. Additionally, a risk assessment will be carried out. Unidentified visitors will be challenged by staff or reported to the Head Teacher. Where The Pointer School uses contractors to provide services, we will set out our safeguarding requirements in the contract between the organisation and our school.

**The *Prevent* statutory guidance:** We have clear protocols for ensuring that any visiting speakers, who might fall within the scope of the *Prevent* duty, whether invited by staff or by the pupils themselves, are suitable and appropriately supervised; this will always include a barred list check and Internet search. At The Pointer School, speakers are never left alone with pupils. The interaction between the *Prevent* requirement to check speakers and the KCSIE (September, 2022) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers.

**Reasons for no longer using a person's services and reporting to the Disclosure and Barring Service (DBA) along with considering referral to the Teaching Regulation Agency (TRA):** If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services and a prohibition order may be appropriate, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service and the TRA as soon as possible if the criteria are met. We also ensure that '*Compromise Agreements*' or '*ACAS Agreements*' never apply in such circumstances.

**Staff Behaviour Policy (Staff Code of Conduct)—power, positions of trust and staff behaviour:** Please refer to the *The Pointer School Staff Code of Conduct and Teachers' Standards* on how adults can ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, counselling and so on). The *Staff Code of Conduct* is wide-ranging and covers staff/pupils relationships (including working alone with pupils) and communications including use of social media, "breach of trust" and expands on the whistle-blowing statement in this policy. The school acknowledged that some staff may be employed as nannies or babysitters outside of school hours and during these periods the staff come under the employment and safeguarding of the alternate employers. Any safeguarding incident during these times would be conducted as appropriate.

**Staff taking medication or other substances:** Staff must seek medical advice if they are taking medication that may affect their ability to care for pupils, and any staff medication must be securely stored and out of the reach of pupils at all times.

**Physical restraint:** Our policy on physical restraint is compliant with the local authority's 'Physical Restraint in Schools' guidance along with guidance from the DfE. Events are recorded and signed by a witness. Staff who are likely to need to use physical intervention are appropriately trained. We ensure that all staff understand when it is and is not appropriate to use reasonable force, to ensure a pupil does not harm themselves or others and staff understand that the term 'reasonable' means using no more force than is needed. We understand that physical intervention of a nature that causes injury or distress to a pupil may be considered under child protection or disciplinary procedures. Where a pupil has been or alleges they have been subject to chastisement through the use of an implement or substance, this will immediately be reported for investigation to the LADO.

# STAFF TRAINING

**Induction and On-going Training for all staff, temporary staff, volunteers, the Head Teacher and the The Governing Body in line with GSCP advice:** Our arrangements for the level and focus of role-appropriate and refresher training is in accordance with GSCP criteria, as required by KCSIE. All staff are provided with copies of key documents, which they are required to understand. For staff that cannot read English, our school takes steps to ensure that they understand key information. This includes the active promotion of British values and an understanding of extremism and radicalisation and child exploitation. All our staff are made aware of the systems that support safeguarding in our school, and these are explained to them, as part of their staff induction. This includes:

- The Safeguarding Children: Child Protection Policy (which includes the procedures for dealing with child on child abuse);
- The identity of the DSL and Deputy DSLs and information about their roles (such as the implications for mental health and pastoral care and how to identify pupils at risk of radicalisation);
- The Staff Behaviour Policy (Staff Code of Conduct) (which covers as a minimum, acceptable use of technologies, the low level concerns policy, staff pupil relationships and communications, including via social media and whistleblowing);
- Part One of KCSIE (DfE: Sept. 2022) and 'Annex B' and copies of policies (such as behaviour management policy, anti-bullying policy, whistleblowing policy, children who are missing education and e-safety including cyber bullying). The school may choose to refer to 'Annex A' of KSCIE (2022) where the induction involves a staff member who is not in direct contact with pupils (e.g Cleaning staff);
- The safeguarding response to children who go missing from education (CME Policy)
- Online Safety Training including having an awareness and understanding of the appropriate filtering and monitoring provisions in place, managing them effectively and knowing how to escalate concerns when identified.
- Pupil behaviour policy (which includes measures to prevent bullying)

We assist staff in understanding and undertaking their roles and responsibilities as set out in Part One of KCSIE. This includes talking new staff through the content of Part One in a level and depth appropriate and proportionate to the person and/or to the particular role for which they are being inducted. There are also in-service training and staff meetings. All staff undertake *Prevent* awareness training and are able to refer pupils to the DSL for further help. Staff are informed of arrangements to listen to pupils by the use of counsellors, listeners, helplines and other systems to gain views and insight.

In addition, all staff receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) as required but at least annually, providing them with the relevant skills and knowledge to safeguard pupils effectively, including:

- managing a report of child on child sexual violence or harassment;
- The process for making referrals to children's social care;
- What to do if a child tells them he/ she is being exploited;
- The early help process and understand their role in it.

This includes identifying emerging problems, liaising with the DSLs, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early-help assessment. Our staff are made aware of the process for making referrals to MASH and statutory assessments under the Children Act of 1989 that may follow a referral, along with the role they might be expected to play in such assessments. Staff are made aware of the requirement to ensure that an appropriate adult is present whenever the police are interviewing a pupil at school or in a police station. Training teaches staff to reassure victims that they are being taken seriously and will be supported and kept safe, so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or harassment, and no victim should ever be made to feel ashamed for making a report.

The DSL makes it clear in induction, in other training, and in guidance provided for staff they have a responsibility to speak up about safeguarding and welfare matters within the school and to external agencies where necessary. This is one part of our establishing a positive safeguarding culture. This applies not only to new staff but also those already in post.

Following consultation with the Local Safeguarding Children Partnership, all staff members and the The Governing Body will undertake appropriate child protection training regularly i.e. every 3 years as a minimum for all staff (The Pointer School provide an annual update to all staff), with the DSL and Deputy DSL attending training every 2 years in line with requirements within KCSIE (DfE: September, 2022) inter-agency working. Such training will include local inter-agency protocols and training in the GSCP approach to *Prevent* duties. *Prevent* training is included at the beginning of school year In-Service Training (INSET); we liaise with GSCP who provide the training.

The Board of Governors will ensure that all Governors receive appropriate safeguarding and child protection training (including online) at their induction, to ensure themselves that safeguarding policies and procedures are effectively in place which support a robust whole organisation approach to safeguarding and regular updating. The Board of Governors will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including Public Sector Equality Duty) and the multi-agency safeguarding arrangements.

**Safeguarding pupils engaged in close, one-to-one teaching:** We recognise that children may be more vulnerable when working with adults in a close one-to-one teaching provision. Please refer to The Pointer School *Staff Behaviour Policy (Code of Conduct)* on how adults can ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student (for example, in one-to-one tuition, sports coaching, counselling and so on). The *Staff Code of Conduct* is wide-ranging and covers staff/students' relationships (including working alone with students) and communications including use of social media, "breach of trust" and expands on the whistle-blowing statement in this policy. The following guidance and arrangements have been taken from our Staff Behaviour (Code of Conduct) Policy which aim to safeguard pupils in one-to-one teaching situations:

- Staff must conduct themselves professionally in their relationships with pupils, parents and staff and must not behave in a way that could bring the School into disrepute or risk allegations being made;
- No member of staff should ever be behind a locked door with a child;
- One-to-one meetings and classes should, wherever possible, take place in public or semi-public places such as classrooms or offices. If in classrooms, ensure the door is left open;
- Staff will at no time travel unaccompanied outside of the School with children;
- Staff should ensure that a meeting is arranged during normal School hours when there are plenty of other people about;
- Staff will avoid sitting or standing in close proximity to the pupil, except as necessary to check work;
- Staff must report any incident that causes you concern to the Designated Safeguarding Lead in accordance with the School's Child Protection Policy, and make a written record (signed and dated); and
- Report any situation where a pupil becomes distressed or angry to the Designated Safeguarding Lead.

# SPECIFIC SAFEGUARDING ISSUES AND INDICATORS

Being subjected to harassment, violence and or abuse, may breach children's rights, as set out in the Human Rights Act.

**PHYSICAL ABUSE: The nature of physical abuse:** A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* e.g. shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally. If a body map is to be used to record physical abuse, they should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse/factors that should increase concern include:

- multiple bruising or bruises and scratches/bi-lateral injuries (especially on the head and face including around the mouth); clusters of bruises – e.g. fingertip bruising (caused by being grasped); bruises around the neck and behind the ears – the most common abusive injuries are to the head;
- marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle;
- bite marks; deliberate burning may also be indicated by the pattern of an instrument or object - e.g. electric fire, cooker, cigarette; scalds with upward splash marks or *tide marks*; untreated injuries; injuries to genital areas;
- recurrent injuries, burns or bald patches; having broken bones or unexplained bruising, burns or welts in different stages of healing; being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable.

**EMOTIONAL ABUSE: Definition of emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. This can also occur when a child is a young carer for a parent who is disabled, has mental health problems or misuses alcohol or drugs. It may involve seeing or hearing the ill treatment of another, for example where there is fighting or violence in the home. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Indicators of emotional abuse: Developmental issues include delays in physical, mental and emotional development; poor school performance and speech disorders, particularly sudden disorders or changes.

**SEXUAL ABUSE:** Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g. relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be committed by anybody, including women and children as well as adult males. Where it comes to our notice that a pupil under the age of 13 is, or may be, sexually active, this will result in an immediate referral to Children's Services and advice being given to the DSL. This will determine how and when information will be shared with parents/guardians/carers and the

investigating agencies.

Indicators of sexual abuse: Damage to genitalia, anus or mouth; sexually transmitted diseases; unexpected pregnancy, especially in very young girls; soreness in genital area, anus or mouth and other medical problems such as chronic itching; unexplained recurrent urinary tract infections and discharges or abdominal pain. The concerns listed are not exhaustive. Staff can and should also record and report other concerns about a child, such as general welfare concerns.

**SEXUAL HARRASSMENT:** When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. 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.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence),
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence

**HARMFUL SEXUAL BEHAVIOUR:** Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. We use the umbrella term "harmful sexual behaviour" (HSB). HSB can occur online and/or face-to-face and can also occur simultaneously. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector. The designated safeguarding lead has a good understanding of HSB. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma.

**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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Far more children are registered to the category of neglect on child protection plans than to the other categories. Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group. Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

Physical indicators of neglect include: constant hunger and stealing food; poor personal (including dental) hygiene – unkempt, dirty or smelly; being underweight; wearing dress unsuitable for weather; poor state of clothing; illness or injury untreated and looking sad, false smiles.

**DOMESTIC VIOLENCE AND ABUSE:** The current government definition of *domestic violence and abuse* (DVA),

now includes 16 and 17-year olds, recognising that they are the largest group to experience domestic abuse and violence. It is now defined as: *'Any incident or pattern of incidents of controlling, coercive or 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. This can encompass, but is not limited to, the following types of abuse: psychological; physical; sexual; financial; emotional'*. It can be psychological, physical, sexual, financial, or emotional, and can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. Children may suffer both directly and indirectly if they live in households where there is domestic violence. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and it will often be appropriate for such children to be regarded as [Children in Need under the Children Act 1989](#). In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Where there is evidence of domestic violence, we will report our concerns to the appropriate agency including children's social care and the police in order to prevent the likelihood of any further abuse taking place. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. The DSL will provide support according to the child's needs and update records about their circumstances.

The Pointer School uses advice on identifying children who are affected by domestic abuse and how they can be helped from the following sources:

[NSPCC](#) - UK domestic-abuse Signs Symptoms Effects

[Safelives](#) - Young people and domestic abuse resources

[Operation Encompass](#) - This was brought in by the Met Police to ensure that schools understand how to support pupils experiencing domestic abuse and to give access to resources. The Pointer School is a part of the Greenwich Police Force Operation Encompass scheme, which means that all instances of domestic abuse affecting our pupils are shared with the school, not just those where an offence can be identified. We have a Key Adult (our DSL), who receives information about any police-attended Domestic Abuse incidents. The Key Adult will be notified prior to the start of the next school day that the police have attended an incident of domestic abuse. This timely information sharing enables appropriate support to be provided for that child so that all interactions, from when the child first arrives at the school gates, are of a positive nature.

**CHILD SEXUAL EXPLOITATION (CSE):** Child sexual exploitation (CSE) is a form of 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 victim may have been sexually exploited even if the sexual activity appears 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. 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. It is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic; grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent; grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Indicators of Child Sexual Exploitation:

- Children who appear with unexplained gifts or new possessions; who associate with other young people involved in exploitation; have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant; who suffer from changes in emotional well-being; children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and regularly miss school or education or do not take part in education; staying away from certain people or avoiding being alone with someone; displaying sexual behaviour that is inappropriate for their age;

- Inappropriate masturbation or self-harm (including eating disorders) and an unwillingness to remove clothes when changing for PE etc;
- Children who have an older boyfriend or girlfriend.

**CHILD CRIMINAL EXPLOITATION (including 'County Lines'):** 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. Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered.

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
- Regularly missing school or education
- Not taking part in education

**YOUTH PRODUCED SEXUAL IMAGERY (SEXTING):** The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal. Youth produced sexual imagery refers to both images and videos where a person under the age of 18 creates and shares sexual imagery of themselves or by another person under the age of 18 or an adult. Alternatively, one is in possession of sexual imagery created by another person under the age of 18.

**FEMALE GENITAL MUTILATION (FGM):** This comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Mandatory reporting duty: [Section 5B of the Female Genital Mutilation Act 2003 \(as inserted by section 74 of the Serious Crime Act 2015\)](#) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

Indicators that FGM happening:

- A child talking about getting ready for a special ceremony; a child's family taking a long trip abroad.
- A child's family being 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 a sibling has undergone FGM; a child talking about going abroad to be 'cut' or to prepare for marriage; Difficulty in walking, sitting or standing; spending lengthier time in the bathroom/toilet than usual.
  - Unusual behaviour after a school absence/reluctance to undertake usual medical examinations.
  - Asking for help, but not detailing the problem in full due to fear or embarrassment.

**HONOUR-BASED ABUSE:** So-called 'honour-based' abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM),

forced marriage, and practices such as breast ironing. All forms of so-called honour-based violence are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Indicators of HBA: Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of [the Multi agency statutory guidance on FGM](#) and pages 13-14 of the [Multi-agency guidelines: Handling case of forced marriage](#). If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multi agency liaison with police and children's social care. In the social context of the school or school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when: the explanation given does not match the injury; the explanation uses words or phrases that do not match the vocabulary of the child (adults words); no explanation is forthcoming; the child (or the parent/carer) is secretive or evasive or the injury is accompanied by allegations of abuse or assault.

**FORCED MARRIAGE:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and schools can play an important role in safeguarding children from forced marriage. The [Forced Marriage Unit has published Multi-agency guidelines](#) and School and school staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk).

**GANGS AND YOUTH VIOLENCE:** We will endeavour to protect our children and young people from exposure to gang activity and exploitation by having robust attendance and behaviour policies and to act on relevant information or allegations. We will take all reports seriously and will share this information appropriately with other agencies to safeguard our pupils from harm.

**PRIVATE FOSTERING ARRANGEMENTS:** A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age. The Pointer School recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify The Royal Borough of Greenwich Children Services of the circumstances.

**CHILDREN AND THE COURT SYSTEM:** The Pointer School recognises that children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. We recognise this can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service and this may be useful for some parents and carers.

**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. Our staff use information provided by [NICCO](#) to support any pupils who have parents in prison, to help mitigate negative consequences for those children.

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

Our Designated Safeguarding Lead and Deputy DSL are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Staff are alert to the signs that families of pupils may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. [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 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.

**TRAFFICKED CHILDREN:** Child trafficking involves moving children across or within national or international borders for the purposes of exploitation. Exploitation includes children being used for sex work, domestic work, restaurant/ sweatshop, drug dealing, shoplifting and benefit fraud. Where the School is made aware of a child is suspected of or actually being trafficked/exploited, including being in Private Fostering, the DSL will report our concerns to Children's Social Care.

**SELF-HARM AND SUICIDAL BEHAVIOUR:** Self-harm can be deliberate with the aim of a child just causing themselves an injury, attempted suicide which does not result in end of life or a successful attempt to end life resulting in death. Majority of self-harmers keep it a secret that goes undiscovered, finding it is the only way to express their feelings. Children self-harm for many reasons including: being bullied both at school or online, mental health issues, eating disorders, domestic abuse, any type of child abuse, parental conflict and bereavement.

Indicators of Self Harm behaviours:

- cutting behaviours and self-poisoning, other forms of self-harm, such as burning, scalding, banging, hair pulling or not taking care of their needs.
- direct injury such as scratching, cutting, burning, hitting yourself, swallowing or putting things inside;
- staying in an abusive relationship, taking risks too easily, eating distress (anorexia and bulimia);
- addiction for example, to alcohol or drugs and low self-esteem and expressions of hopelessness.

During a disclosure of self-harm, staff should check whether the pupil has ingested anything or has anything on their person that could cause damage or harm. Any concerns from staff members should be referred to the DSL, as an early help assessment may need to be completed to involve services that can help, or in the case of significant harm a referral can be made to Children's Services.

**RADICALISATION:** KCSiE definitions (KCSiE 2022)

Radicalisation is the process by which a person comes to support terrorism and forms of extremism.

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

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

Indicators of radicalisation: There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The Internet and the use of social media in particular has become a major factor in the radicalisation of young people. It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or Deputy) making a referral to the [Channel programme](#).

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

**MODERN SLAVERY:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Signs of modern slavery include victims:

- being unable to leave their home environment
- showing signs that their movements are being controlled
- show fear or anxiety
- be subjected to violence or threats of violence against themselves or against their family members and loved ones
- suffer injuries that appear to be the result of an assault
- have false identity or travel documents (or none at all)
- be found in or connected to a type of location likely to be used for exploiting people
- be unfamiliar with the local language
- allow others to speak for them when addressed directly
- act as if they were instructed by someone else
- be disciplined through punishment
- be distrustful of the authorities
- be threatened with being handed over to the authorities
- come from a place known to be a source of human trafficking
- live in poor or substandard accommodations
- have no access to medical care
- have limited or no social interaction
- have limited contact with their families or with people outside of their immediate environment
- be unable to communicate freely with others

Support for child victims is provided through the Local Authority. When encountering a child victim, the Designated Safeguarding Lead will ensure the Local Authority children's services are contacted immediately. A National Referral Mechanism (NRM) referral should still be made by the staff member who identified the child victim. Child victims do not need to consent to enter the National Referral Mechanism, and as such, an NRM referral should always be made using the [Modern Slavery Portal](#). The Designated Safeguarding Lead will support the staff member making this referral. Even though children do not need to consent to enter the NRM, every effort should be made to ensure the child understands what is happening. Best practice for children's social care is to keep children informed of what is happening using trauma-informed and age-appropriate methods of communication in a language that they fully understand.

**CYBER CRIME:** Cybercrime is criminal activity committed using computers and/or The Internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead will consider referring into the Cyber Choices programme which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

**UPSKIRTING:** The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim. The initial response to a report from a child is incredibly important as not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. Victims of Upskirting will be reassured that they are being taken seriously and that they will be supported and kept safe. They will not be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will they be made to feel ashamed for making a report.

The above list is not exhaustive and as new policy guidance and legislation develops within the remit of Safeguarding we will review and update our policy as appropriate and in line with the Local Safeguarding Children Partnership and local authority to ensure our school is a safe place to learn and work.

The Pointer School recognises that abuse, neglect and safeguarding issues are rarely safeguarding events that can be covered with one definition or label. In most cases multiple issues will overlap with one another. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example the National Society for the Prevention of Cruelty to Children (NSPCC) offers information for schools and colleges on the TES website and also on its own website [www.nspcc.org.uk/preventing-abuse/](http://www.nspcc.org.uk/preventing-abuse/). Schools can also access broad government guidance on the issues listed here via the GOV.UK website: <https://www.gov.uk/>.

**FABRICATED ILLNESS:** Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer significant harm through the deliberate action of their parent and which is attributed by the parent to another cause. There are three main ways of the parent fabricating

1. Fabrication of signs and symptoms, including fabrication of past medical history.
2. Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents or specimens of bodily fluid.
3. Induction of illness by a variety of means.

If The Pointer School suspects a child is the victim of a fabricated illness, advice will be sought from the local authority to receive guidance on how to proceed. Clear and accurate records will be kept on any child suspected of suffering from a fabricated illness.

# SEQUENCE OF EVENTS TO BE FOLLOWED WHEN A YOUNG PERSON DISCLOSES ABUSE OR STAFF HAVE A CONCERN ABOUT A CHILD

*The following strict guidance relates to any disclosures involving events within or outside the school or concerning adults or other children.*

It is important that children receive the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:

- identify and refer any concerns about a child
- keep clear written records
- listen to the views of the child
- reassess concerns if the child's situation does not improve
- share information quickly and challenge inaction

Staff see children regularly and know them well, so are in a unique position to observe signs of neglect, abuse, emotional distress, changes in behaviour and/or failure to thrive. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected. They may not recognise their experiences as harmful. For example, pupils may feel embarrassed, humiliated, or threatened. This could be due to a vulnerability, disability or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is more common with primary aged children for concerns to arise about a child through staff observations and casual conversation rather than a child making a direct disclosure. There may also be a change in a pupil's art or written work which may show signs of confusion or distress. Staff should be aware that younger pupils may also talk about, or demonstrate behaviour, through their play which may give rise to safeguarding concerns. Concerns may also be raised about a parent/carer's interaction with a pupil or issues such as parental alcohol misuse, domestic abuse, or mental health. If there is any concern at all the incidents must be reported and recorded. In many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately. This policy gives details of some of the types of abuse and safeguarding issues with which staff should be familiar.

**If a member of staff is concerned about a pupil:** The matter should be referred immediately to the DSL, or the Deputy DSL in the DSL's absence. Staff may speak directly to the DSL or Deputy DSL first to discuss their concerns about a pupil or may send their concerns via a Worry Form. In either case, reporting a concern must not be delayed and must be reported as soon as possible and no later than the same working day. In all instances, a written record will be made of the concern, which is kept and monitored by the DSL.

**If a pupil makes a formal disclosure of abuse:** It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Staff should follow the below guidance:

- **Create a safe environment** by offering the child a private and safe place if possible. Stay calm and reassure the child and stress that he/she is not to blame. Tell the child that you know how difficult it must have been to confide in you. If there is a need for medical attention seek assistance without delay.
- **Listen** to what the child has to say and take them seriously. Stay calm, reassuring the child but *advising that you cannot promise to keep a secret or assure confidentiality* (as this may ultimately not be in the best interest of the child). Tell the child what you are going to do next after the disclosure.
- **When talking to the child**, do not interview the child, and keep questions to a minimum. Encourage the child to use his/her own words and do not ask leading questions, interrupt the dialogue or make assumptions, which might give particular answers. Do not repeat the disclosure or ask the child to repeat his or her disclosure other than to clarify what is being said. Do not display shock or disbelief. Seek consent from the child to share any information disclosed but, should consent not be given, an explanation can be given as to why the DSL must be told.

- **Record** in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the child (as much as possible in the child's own words) and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure. After the disclosure **record in writing** the child's name, address and date of birth along with the child's behaviour and emotional state, who else was present at the time of the disclosure. Sign (with time and date) all notes made and give them to the DSL. When the child has finished speaking, do not leave the child alone, but speak to someone who can help keep the child safe. Call for immediate assistance from the DSL or Deputy DSL or follow the procedures for allegations against staff, volunteers, and The Governing Body. The DSL (or other responsible person within the scope of this policy) will then deal with the matter. Do not ask the child to repeat what he or she has said to the DSL. The child has chosen to tell a member of staff and this account will be believed and actions taken accordingly.
- **Do not take responsibility** for investigating the allegation yourself, as investigation is the sole statutory responsibility of Children's Services and/or the police. Do not attempt to contact in any way any person mentioned in the disclosure. Reassure the child that you will ensure the matter will be dealt with. Immediately consult the DSL so that any appropriate action can be taken to protect the pupil if necessary. Only tell those people that it is necessary to inform; the DSL will consider the information and decide on the next steps. Until otherwise directed by the DSL, do not speak to anyone about the fact or content of the disclosure. Every complaint or suspicion of abuse from within or outside the school will be taken seriously and action taken in accordance with this policy.
- **Never** take photographs of injuries or examine marks and injuries solely to assess whether they may have been caused by abuse or investigate or probe, aiming to prove or disprove possible abuse. Do not assume that someone else will take the necessary action. Do not speculate or accuse anybody, confront another person (adult or child) allegedly involved, offer opinions about what is being said or about people allegedly involved or forget to record what you have been told. Never fail to pass the information on to the correct person, or ask a child to sign a written copy of the disclosure or a 'statement'. During term time, the DSL (or deputy DSL) should always be available during school hours for staff to discuss any safeguarding concerns. Our school will organise adequate and appropriate cover arrangements for any out of hours/out of time activities and also during school holidays.

**Action taken by the DSL:** On receipt of the safeguarding report, the DSL must record the decisions made and action taken. Action will depend on the nature of the concern. It may include one or more of the following:

- (a) monitoring the pupil in school
- (b) a discussion with parents
- (c) early help intervention from the school and/or another agency
- (d) referral to Children's Social Services
- (e) referral to the LADO
- (f) report to the police

The member(s) of staff making the report will be informed by the DSL of the action taken. If the pupil's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

# ALLEGATIONS AGAINST STAFF, SUPPLY STAFF, VOLUNTEERS, CONTRACTORS, DSLs AND THE GOVERNING BODY (INCLUDING LOW-LEVEL CONCERNS)

This applies where an adult within the school community has behaved in a way that has harmed, may have harmed or poses a risk of harm to a child. This also applies when an adult within the school community may have possibly committed a criminal offence against or related to a child.

- **Allegations concerning staff, supply staff, volunteers, contractors or the DSL are to be reported straight away to the Head.** In the Head's absence, the referral should be made to the Safeguarding Governor. The Head will immediately contact the LADO to discuss the allegation and will act on the advice provided. The individual against whom the allegation is made is not to be informed.
- **Allegations concerning the Head are to be reported straight away to the The Governing Body via the Safeguarding Governor.** The safeguarding Governor will make the report to the LADO . The Head is not to be informed.
- **Allegations concerning the The Governing Body are to be reported to the LADO directly** (this referral can be made via the DSL). This must be done immediately and certainly within 24 hours. The Governing Body is not to be informed.

Please note that where staff feel that a conflict of interests would arise from reporting an allegation to the Head, it should be reported directly to the LADO.

Allegations concerning dismissed/removed staff, or staff that would have been dismissed/removed are to be reported straight away to the Disclosure & Barring Service (DBS). Allegations concerning professional misconduct are to be reported straight away to the Teaching Regulation Agency (TRA). Allegations against an adult who is no longer employed by the school, or historical allegations, will be referred to the police. All unnecessary delays should be eradicated and inaction at any level can and should be challenged. In each case above, the LADO will be given sufficient detail to allow consideration of the nature, content and context of the allegation and to agree a course of action including any involvement of the Police. The Police will be informed if a criminal offence is alleged. Guidance will also be sought from the LADO and/or Police to enable the school to make a decision about whether or not the person against whom an allegation has been made should be allowed to remain on school premises and if so what, if any, conditions should apply. If The Pointer School were given information that suggested that a member of staff was abusing a pupil who is not a pupil at the school, the DSL would immediately follow the procedure as if it were one of our own pupils. The Pointer School will also follow these procedures where a member of staff has been involved in something out of school which is not safeguarding but could affect their ability to work with children e.g. staff members convicted of domestic abuse.

In borderline cases, where there is room for doubt as to whether a referral should be made, the DSL will consult with the LADO on a no names basis without identifying the family. However, as soon as sufficient concern exists that a pupil may be at risk of significant harm, a referral to Children's Services will be made without delay. The school will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the Police will be informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the parents of the child/children agreed. The Pointer School will make every effort to maintain confidentiality and guard against publicity if there are allegations against teachers or staff up to the point where the accused person is charged with an offence. The following definitions will be used when determining the outcome of all allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;

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

**Unsubstantiated, false or malicious allegations:** Where an allegation by a pupil is proven to have been deliberately invented or malicious, the Head Teacher will consider whether to take disciplinary action in accordance with the school's Behaviour, Discipline and Sanctions Policy following consultation with the LADO. Where a parent has made deliberately invented or malicious allegations, the Head Teacher will consider whether to terminate the pupils' placement at the school. This is on the basis that he or she has treated the school or a member of staff unreasonably, unless moving forward; a working relationship based on trust, respect and transparency is established. The Pointer School reserves the right to contact MASH or the Police to determine the appropriate action. The school has a duty of care towards its employees and, as such, it must ensure that effective support is provided for anyone facing an allegation through the school's Human Resources (HR)/Personnel arrangements.

**Allegations against supply staff:** In cases of allegations or concerns against supply staff, the school would work with the supply agency to ensure allegations are dealt with properly. The school's governing board should discuss with the agency whether it is appropriate to suspend the supply teacher or move them to another department while the investigation is carried out. While the supply agency should be fully involved and co-operate, the school will take the lead in the investigation. Our school's HR department will inform any supply agencies of our process for managing allegations.

**Low level concerns:** 'The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

Examples of 'low-level' concerns could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

At The Pointer School we expect staff to share all low level concerns, in order to create a culture of openness, trust and transparency in which the school's values as set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Low level concerns should be reported following the same procedures as allegations against staff:

**Low level concerns about staff, supply staff, volunteers, contractors or the DSL are to be reported straight away to the Head.**

- **Low level concerns about the Head are to be reported straight away to the The Governing Body via the Safeguarding Governor.**
- **Low level concerns about members of the The Governing Body are to be reported to the LADO directly.**

The Pointer School Safeguarding Policy aims to prevent Low level concerns by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from problematic or inappropriate behaviour, in themselves and others;
- Empowering staff to share any low-level safeguarding concerns with the Head Teacher;
- 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.

**Reporting and responding to low level concerns:** Reports will be logged in writing by the

Headteacher with details of the concern, the context in which it arose, and action taken. The name of the person reporting would also be noted, respecting wishes to remain anonymous where possible. The low-level concerns reports will be kept in a confidential file and monitored by the Headteacher to identify and respond to any patterns of concerning, problematic or inappropriate behaviour. The rationale for all decisions made and actions taken must be recorded. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns. However, the Headteacher may wish to consult with the DSL and take a more collaborative decision-making approach if the need arises.

Where a pattern of behaviour is identified, the school will seek advice from the LADO on the next steps to take. This may involve internal disciplinary procedures or a formal referral to the LADO if the harms threshold is met. The Headteacher will also consider if any wider cultural issues in the school enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimize the risk of recurrence.

Any low-level concerns reported about supply or agency staff and contractors will be shared with their employers so that potential patterns of inappropriate behaviour can be identified.

# ABUSE OF ONE OR MORE PUPILS ON ANOTHER PUPIL; SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

**Outside of School:** At our school we recognise that young people's behaviours, levels of vulnerability and levels of resilience are all informed by the social/public, as well as private, contexts in which young people spend their time. When spending time in these extra-familial contexts young people may be exposed to healthy norms which promote pro-social relationships, or they may encounter harmful norms that are conducive to abusive and exploitative relationships. These harms can include (but are not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships, criminal exploitation, serious youth violence, county lines and radicalisation. All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside our school and/or can occur between children outside of these environments (KSCiE 2022).

As a result, all staff, but especially the DSL, identify, assess and intervene where possible in all of the social environments where abuse and exploitation of young people can occur – in essence to take a contextual approach to safeguarding. For example, our school leadership works with professionals and the pupil body to challenge harmful, gendered school cultures, thus improving the pre-existing school environment. Additionally, we help to promote a culture of safety with the curriculum and around the school regarding pupils' online activities – a place where young people spend an increasing amount of time, raising their vulnerability to potential abuse.

**Concerns and allegations of abuse made against other children (child on child abuse inclusive of sexual violence or harassment and banter):** We recognise that some pupils on occasion will negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Anti-Bullying (including Cyber-bullying) and Behaviour Management Policies. Staff are clear as to our policy and procedures with regards to child on child abuse and are trained to manage a report of child on child sexual violence and sexual harassment. Any concerns of this nature must be reported to the DSL.

There are different gender issues that can be prevalent when dealing with child on child abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence). We recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all child on child abuse is unacceptable and will be taken seriously. We make it clear that abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up', as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Child on child abuse can take many forms, including:

- Sexual Violence and sexual harassment;
- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying);
- Abuse in intimate relationships between peers;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexting (also known as youth produced sexual imagery);
- Causing someone to engage in sexual activity without consent (such as forcing them to strip, touch themselves sexually, or engage in sexual activity with a third party);
- 'Upskirting' (taking images under a person's clothing without them knowing) and
- Initiation/hazing type violence and rituals (any activity expected of someone in joining or participating in a group that humiliates, degrades, abuses, or endangers them regardless of a person's willingness to participate. The initiation rites can range from relatively benign pranks to protracted patterns of behaviour that rise to the level of abuse or criminal misconduct).

When dealing with abuse of young people from peers, we follow the key safeguarding documents, [KSCiE 2022](#), [the Human Rights Act](#), [the Equality Act](#). Sexualised abuse, including verbal abuse by peers is a safeguarding issue and is included in the school's broader approach to safeguarding. If the school received an allegation of abuse by one or more pupils but is alleged to have taken place outside of the school premises, our safeguarding principles remain the same, and we could still carry out a referral to children's services as necessary. However,

where there is 'reasonable cause to suspect that a pupil is suffering, or likely to suffer significant harm' the concern or allegation of child on child abuse must be reported to the DSL immediately, who will then refer to the MASH to discuss the case. A factual record should be made of the concern or allegation, but no attempt at this stage should be made to investigate the circumstances. A copy of the discussions and outcomes will be kept in both pupils' files. Additionally, if appropriate the DSL will also refer pupils to an external safeguarding agency such as Childline and NSPCC. Even if there are no reported cases of child on child abuse, staff at The Pointer School are advised to maintain an attitude of 'it could happen here', and that this may still be happening without our knowledge as it is not being reported.

**BULLYING** - Please also refer to our anti-bullying policy which sets out our procedures in order to prevent bullying and to deal with it if and when it occurs within the school. This may be defined as deliberate, repeated (systematic) aggressive verbal, psychological or physical conduct by an individual or group against another person or persons. Very often bullying is the act of oppressing or dominating by threat or force where the aggressor may persecute or tease physically or morally in order to frighten into action or inaction. Bullying can include:

- Physical: pushing, hitting, kicking, pinching etc.
- Verbal: name-calling, spreading rumours, constant teasing and sarcasm
- Emotional: tormenting, ridiculing, humiliating, ignoring
- Racial: taunts, graffiti and gestures; Religious / cultural
- Sexual, sexist or homophobic: unwanted physical contact or abusive comments
- Cyber-bullying: through social networking websites, mobile phones and text messages, photographs and email

**Signs that may indicate bullying:**

- Behavioural changes such as reduced concentration, becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go to school etc.; a marked drop off in performance at school
- Physical signs such as stomach aches, headaches, difficulties in sleeping, bingeing on food, cigarettes or alcohol and a shortage of money or frequent loss of possessions.

**Minimising the risk of child on child abuse:** At The Pointer School, we recognise the wide variety of pupils' backgrounds and cultures who attend the school and as such, the requirement for us to promote pupils to respect, tolerate and show good will toward each other. We have employed a number of procedures to help minimise the risk of child on child abuse, with the majority of these focusing on educating our pupils about what is and what is not appropriate with regards to all forms of relationships with their peers. As part of our PSHEE and Relationship and Sex Education (RSE) lessons, we promote healthy and respectful peer-to-peer communications and behaviours between our pupils and provide an environment which challenges inappropriate behaviour. We teach our pupils to look out for potential signs that there may be an imbalance in power or control, the importance of permission-seeking and giving in relationships with friends, peers and adults and what to do to seek support. We make it explicit to our pupils what constitutes sexual harassment and sexual violence and why these are always unacceptable. We also teach our pupils about different types of bullying (including cyberbullying), the impact of bullying, responsibilities of bystanders (primarily reporting bullying to an adult) and how to get help. We keep online safety as a 'running and interrelated theme' throughout our curriculum. Staff are encouraged to challenge any abusive behaviours between peers.

**Confidentially reporting abuse:** Pupils may feel anxious about confiding in an adult about abuse at home, so at The Pointer School, we understand that abuse could be occurring although it has not yet been reported. Any child that reports abuse will be taken seriously and accurately documented by the Designated Safeguarding lead. Any documentation will be stored securely in a place that only the Head Teacher and the Designated Safeguarding Lead/Deputy Designated safeguarding lead has access to.

To encourage pupils to feel comfortable reporting abuse The Pointer School has put in place a number of strategies:

- Worry posters around the school and in the classrooms with pictures of staff and pupils they can talk to
- PSHE lessons which explicitly state people in their life they can talk to for help
- Confidential worry boxes that are locked to respect confidentiality

**Sexual Violence and Sexual Harassment between children (KCSiE Part 5)** At The Pointer School, we take our definition of sexual violence from the [Sexual Offences Act 2003](#), which considers rape, assault by penetration

and sexual assault, all types of sexual violence. In addition, we define sexual violence as 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual violence and sexual harassment can be between two children, or a group of children. Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment. We recognise that Children with SEND are likely to be more vulnerable. The Pointer School is aware that online sexual violence or sexual harassment can be more complex, such as non-consensual sharing of sexual images; sexualised online bullying; unwanted sexual comments including on social media and sexual exploitation; coercion and threats. 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. We recognise that sexual violence and harassment can occur both online and offline, both physically and verbally and is never acceptable. We make it clear that all forms of sexual violence and harassment are unacceptable and will not be tolerated. 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 (this may cross a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting);
- inappropriate sexual comments on social media;
- exploitation; coercion and threats.

Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Where the report includes an online element, staff will be aware of [searching, screening and confiscation advice \(for schools\)](#) and [UKCCIS Sexting advice \(for schools\)](#) and colleges. Staff will NOT view or forward illegal images of a child and will seek advice from the above when viewing an image is unavoidable.

**Responding to reports of sexual violence and sexual harassment:** Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. Though it may not be necessary to report one-off issues of sexual harassment to the police, each allegation of abuse will be taken seriously, and the Designated Safeguarding Lead will still refer these allegations to children's social care, who will support the school in deciding whether the victim or alleged perpetrator are in need of protection or other services. However, all allegations of sexual violence will be reported to the police, in parallel with children's social care. Though children's sexual behaviours can be developmentally expected, some more harmful sexual behaviours may cause developmental damage. The [Brook sexual behaviours traffic light tool](#) is used to help us consider harmful sexual behaviours. Reports of sexual violence are often complex and require difficult decisions to be made, on a case-by-case basis, with the DSL taking the lead role, supported by external agencies such as children's social care or the police. Some situations are statutorily clear: a child under the age of 13 can never consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves.

#### **The immediate response to a disclosure report:**

- A factual record should be made of the concern or allegation, taking the victim seriously, but no attempt at this stage should be made to investigate the circumstances, unless a child is in immediate danger or is at risk of harm, in which case, an immediate referral will be made to children's social care and/or the police.
- Additionally, in cases where there is a report of rape, assault by penetration or sexual assault this should be passed to the police.
- Victims will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; they will not be made to feel ashamed for making a disclosure.
- Staff will explain that the law is in place to protect children rather than to criminalize them and this should be explained in such a way that avoids alarming or distressing them.
- The DSL will follow the advice for practitioners in: [What to do if you're worried a child is being abused](#) and will follow through the outcomes of the discussion and if so advised by Children Social Care, will make a formal referral if the incident meets the referral threshold set by the Local Safeguarding Children Partnership ensuring effective information sharing with any agencies or other professionals involved.
- Good record keeping of related conversations, meetings and communications with a copy of the discussions and outcomes will be kept securely. *Staff should not assume that someone else is dealing with*

*the incident, and should discuss concerns with the DSL.*

- Where an incident between two pupils takes place away from the school, the school's duties and procedures remain the same. The Pointer School will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact of social media. The DSL will make an immediate written risk and needs assessment where there has been a report of sexual violence, considering the victim, alleged perpetrator and other children and staff at the school (including actions to protect them). Risk assessments will be kept under review. In cases of sexual violence, a professional risk assessment by external specialists may be required, and should be used to inform the school's own risk assessment. The risk assessment will consider the risks posed to all our children and put adequate measures in place to keep them safe.
- The Pointer School will consider carefully any report of sexual violence or harassment and act in the best interests of the child. The Pointer School will also consider carefully when to inform the alleged perpetrator, and this may be discussed with relevant agencies. The school actively considers the risks posed to our pupils and ensures adequate measures are in place to protect pupils and keep them safe.
- Staff may be expected to participate in any early help assessment, child protection enquiry, strategy discussion or other outcome, following a referral.

**Managing the report:** Whatever the school's response, it is underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded. Dependent on the disclosure of sexual violence or sexual harassment, the school will consider the following courses of action:

- Managing internally: in some cases of sexual harassment (such as one-off incidents) the school may manage the incident internally, without the involvement of early help, following our behaviour management policy;
- Involve Early help: when a report may not require the use of statutory intervention, involving early help is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
- Referral to children's social care: in cases where there has been harm, is at risk of harm, or there is an immediate danger, a referral will be made to children's social care. Parents or carers will generally be informed of this, unless there is a clear reason not to at this stage. A risk and needs assessment will also be produced at this stage;
- Reporting to the Police: in cases where rape, assault by penetration or sexual assault is reported. The Pointer School will not wait for the outcome of a Police investigation before protecting the victim, perpetrator and other children in the school. The DSL will work closely with the Police to ensure that the school's actions do not jeopardise the Police investigation. If a child is convicted or cautioned, the school will update the risk assessment and consider suitable action through their behaviour policy.

It is important for The Pointer School to ensure the victim and perpetrator remain protected, especially from bullying or harassment. Where no further action is taken, or a child found not guilty, The Pointer School will continue to support the victim and perpetrator.

**The Victim's wishes:** With any report of sexual violence and/or harassment, the DSL will give the victim as much control as is reasonably possible over decisions on how any investigation will be progressed and any support that they will be offered. However, this must be balanced against the school's duty and responsibilities to protect other children and the following factors:

- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of whether harmful sexual behaviour has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children, including age gaps or differences in maturity, cognition or understanding (including SEND or learning difficulties);
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- has the sexual violence / harassment happened within an intimate personal relationship;
- are there ongoing risks to the victim, other children, adult pupils or school staff; and
- other related issues and wider context (including links to sexual exploitation and child criminal exploitation).

**Confidentiality:** The victim may ask the school not to tell anyone about an instance of abuse. However, the school may still lawfully share the information if there is another basis under the UK GDPR (for example, the public interest task). Staff must seek advice from the DSL, who will consider the following:

- Parents / carers would normally be informed, unless it puts the victim at greater risk.
- Where abuse which is a crime has been reported (eg rape or sexual assault), this must be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice, approach in these cases.
- Ultimately the DSL or Deputy will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, and the reasons will be explained to the victim and appropriate specialist support will be offered to the child.

**Anonymity:** Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, appropriate staff will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. We will do all we can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved. We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The school / college will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community. Any sanctions required following a report of child-on-child abuse will be determined on a case-by-case basis.

**Support for victims of child on child abuse:** All pupils involved, whether perpetrator or victim, are treated as being 'at risk'; a thorough risk-assessment and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) will be carried out with a view to ensuring the safety of all pupils and that example, whether the accused pupil should be removed from school for a period, or removal of the alleged perpetrator from classes and any transport etc which is shared with the victim, whether contact with certain individuals should be prevented or supervised, the availability of counselling such as referring pupils to an external safeguarding agency such as ChildLine and NSPCC and the adequacy of arrangements for listening to children etc. We recognise that any actions taken will be in the best interests of both children and is not perceived to be a judgement of guilt of the alleged perpetrator. Additionally:

- Support for the victim will consider their age, the nature of the allegations and the risk of further abuse; an alleged perpetrator may have unmet needs themselves.
- The needs and wishes of the victim will be paramount, and they will be able to continue their normal routine as far as possible, so that school is a safe space for them.
- The Pointer School will be prepared to support a victim over a long period of time.
- The Pointer School will do everything we reasonably can to protect victims from bullying or harassment as a result of any report they have made.
- Where the victim or perpetrator moves to another school it is important that the new establishment is made aware of any ongoing support needs.
- The Pointer School must ensure the victim is safeguarded, but still provide the perpetrator with an education and support as necessary.
- The Pointer School may discipline the alleged perpetrator, including while the police or social care investigation is ongoing, although they will liaise with these bodies to assist in determining any sanctions.
- The Pointer School will be clear about when their actions are to support the victim or perpetrator, and when their actions are to discipline the perpetrator for their past conduct.
- A pupil against whom an allegation of abuse has been made may be excluded from the school for a fixed period during the investigation and the School's policy on behaviour, discipline and sanctions will apply.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of Children's Social Care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. Normally, the DSL will try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement to make a referral to MASH if necessary. However, in accordance with DfE guidance, this will only be done when

this will not place the child at increased risk. The child's views will also be taken into account. Where there are doubts or reservations about involving the child's family, the DSL should clarify with MASH or the police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation. Where appropriate, the DSL should help the parents understand that a referral is in the interests of the child and that the school will be involved in the inquiry or police investigation. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to exclude him / her during the investigation.

Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures. In situations where the school considers a safeguarding risk is present, a risk assessment will be prepared along with a preventative supervision plan. The plan should be monitored and a date set for a follow-up evaluation with everyone concerned. When a pupil is in need of *urgent* medical attention and there is suspicion of abuse an ambulance should be called. If the response from the emergency services states that the school should take the child to hospital then the DSL, with an escort, should take the child to the Accident and Emergency Unit at the nearest hospital. They should first notify MASH and seek advice about what action the MASH or the police will take and how the parents will be informed. Normally, parents would be informed that a child requires urgent hospital attention. If the suspected abuse is sexual then the medical examination should be delayed until the MASH and the police can liaise with the hospital, unless the needs of the child are such that medical attention is the priority. There must at all times be a responsible adult with the child, whether from the school, MASH or the police, if the parents are not included. All unnecessary delays should be eradicated and inaction at any level can and should be challenged. In borderline cases, this can be done informally and without giving names in the first instance. The School will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the police will be informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the parents of the child/children agreed.

**Working with parents and carers:** The Pointer School will, in most cases, engage with the parents of both the victim and the perpetrator and will consider carefully what information they provide. It is good practice for the school to meet the victim's parents with the victim present to discuss safeguarding arrangements and also good practice to meet the perpetrator's parents to discuss what arrangements are being put in place, such as moving them out of classes.

**Supporting witnesses of sexual violence or sexual harassment:** Consideration should be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required. Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". The school will do all it can to ensure both the victim and alleged perpetrator, and any witnesses, are not being bullied or harassed. Social media is very likely to play a significant role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator and a very high likelihood that friends from either side could well harass the victim or alleged perpetrator online. When writing a risk-assessment for the pupils involved in an incident of sexual violence or sexual harassment, the we will consider any additional potential support needs to keep all our pupils safe.

**Consensual image sharing:** Especially between older children of the same age, may require a different response than the schools behaviour policy. It might not be abusive - but children still need to know it is illegal - whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos.

# PREVENT DUTY: TEACHING PUPILS HOW TO KEEP SAFE INCLUDING THE DELIVERY OF PREVENT STRATEGY AND SMSC (SPIRITUAL, MORAL, SOCIAL AND CULTURAL) DEVELOPMENT

**The *Prevent* statutory guidance (2021):** We have clear protocols for ensuring that any visiting speakers, who might fall within the scope of the *Prevent* duty, whether invited by staff or by the pupils themselves, are suitable and appropriately supervised; this will always include a barred list check and Internet search. At The Pointer School, speakers are never left alone with pupils. The interaction between the *Prevent* requirement to check speakers and the [KCSIE](#) (September, 2022) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers.

**Preventing Extremism and Radicalisation: (Also please refer to our Preventing Extremism and Radicalisation policy and also Appendix 1 of this policy).** The Pointer School will also ensure that we can 'demonstrate activity', as required by the statutory guidance, in the following key areas: risk assessment of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, working in partnership, staff training and IT policies. This is wholly in keeping with our school ethos and approach to promote a broad, tolerant and open-minded understanding of the world around us, from EYFS onwards including an appreciation of the democratic process and precluding the promotion of partisan political views in the classroom, in extra and co-curricular activities, or in any other aspect of the school's activities. The school is able to demonstrate a general understanding of the risks affecting pupils and young people in the area.

Protecting pupils from the risk of radicalisation is seen as part of The Pointer School's wider safeguarding duties, and is similar in nature to protecting pupils from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. We understand that during the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. We consider the level of risk of pupils identified as being at 'risk of radicalisation' and make an appropriate referral, which can include Channel or Children's Services. Our *Prevent* strategy demonstrates a specific understanding of the risks affecting children and young people and identifying pupils who may be at risk of radicalisation, including support we can give.

***Prevent* duty:** The DSL receives appropriate training, in accordance with Annex B of KCSIE (including higher level *Prevent* awareness training) at least every two years in order to:

- provide advice and support to members of staff on protecting pupils from radicalisation;
- equip staff through *Prevent*, Channel and other appropriate training to identify and assess pupils at risk of being drawn into terrorism and to challenge extremist ideas;
- liaise with those responsible for Personal, Social, Health and Economic Education (PSHEE), Spiritual, Moral, Social and Cultural (SMSC) assembly and other appropriate curricular programmes actively to promote British values and to teach pupils about the dangers of radicalisation and extremism; and
- liaise with those responsible for the school's electronic systems seriously to limit through appropriate filtering mechanisms the scope for access through these systems to any website or Internet source deemed problematic from a *Prevent* perspective.

**Teaching pupils how to Keep Safe (Educating pupils about safeguarding and radicalisation including the delivery of the *Prevent* Strategy):** Our school ensures that pupils develop a clear understanding both of safeguarding issues and what they may do to play their part in ensuring their welfare and safety and in building resilience against the dangers of radicalisation: our programme for PSHE supports this process as part of a broad and balanced curriculum. Within our PSHE curriculum, we have a programme for Relationship and Sex Education (RSE) which includes issues such as:

- “sexting”, “banter”, sexual assault between young people and gender based issues; healthy and respectful relationships;
- what respectful behaviour looks like; gender roles, stereotyping, equality; body confidence and self-esteem;
- prejudiced behaviour; addressing cultures of sexual harassment; keeping safe whilst online (and when accessing remote learning) and
- that sexual violence and sexual harassment is always wrong; and addressing cultures of sexual harassment.

We ensure that our pupils are aware of the dangers of these safeguarding issues and promote positive relationships based on mutual respect. Through our School values, we encourage pupils to respect others. Age appropriate anti-bullying advising lessons are held in school and include the risks of cyberbullying and on-line safety, and child-on-child abuse, including how victims will be supported. Additionally, whenever appropriate, subjects in the curriculum and co-curricular activities will be used to reinforce the messages given.

Age appropriate anti-bullying assemblies are held regularly and the School Council discusses ways to eliminate bullying within our school. All such meetings include the risks of cyberbullying and online safety and child-on-child abuse, including how victims will be supported. Additionally, appropriate subjects in the curriculum and co-curricular activities will be used to reinforce the messages given. If a member of staff becomes aware of an allegation or suspected case, which involves sexting, inappropriate banter or sexual assault between young pupils, gender based or otherwise, it will be considered as a safeguarding concern and reported to the DSL, who will consider the allegation on a case-by-case basis. This may involve the school's anti-bullying procedures or the parents of the pupils involved and in more extreme circumstances the police. In the case of serious harm, Greenwich Social care is to be informed from the outset.

**Within Spiritual Moral, Social and Cultural (SMSC) development**, we instill within pupils values that build resilience and prevent pupils being drawn into radicalisation and extremism. We explore what extremism might look like and how this poses a threat to peace and we build resilience to radicalism by providing a safe environment for debating controversial issues. We actively promote British Values within our SMSC, and create an environment in which pupils know they are listened to and valued. We educate our pupils to reject violence and cruelty in whatever forms they take on, whether it be from animal rights activists, extremist religious influenced groups, racist and fascist organisations, or any other extremist group.

**Emerging Technology including the Internet and the use of social media** in particular has become a major factor in the radicalisation of young people. We ensure that pupils are safe from potentially harmful and inappropriate content including terrorist and extremist material when accessing the Internet on school systems through appropriate levels of filtering, Internet safety rules and e-safety education within the curriculum. Our E-safety policy details the actions and behaviour required from pupils and members of staff in order to maintain a safe electronic environment and is based on current best practice drawn from a wide range of sources. Our key message to keep pupils and young people safe is to be promoted and should be applied to both online and offline behaviours. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. However, we are careful to ensure “over blocking” does not lead to unreasonable restrictions. We have a whole school approach to on-line safety, including a clear policy on the use of mobile technology.

# SAFEGUARDING VULNERABLE PUPILS INCLUDING: DISABLED CHILDREN, PUPILS WITH MEDICAL CONDITIONS, EYFS, LGBT AND LOOKED AFTER CHILDREN

**EYFS (Additional requirements):** This Safeguarding Policy, which applies to the whole school, also applies to the EYFS and details our procedures for safeguarding in the EYFS. We inform ISA immediately (on the same day), or as soon as is reasonably practicable, but certainly within 24 hours, of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere). This could include any other abuse that is alleged to have taken place on the premises and of the action taken in respect of these allegations. Safeguarding training for staff in the EYFS will include guidance on identifying signs of possible abuse and neglect (such as significant changes in a pupil's behaviour, deterioration in well-being, physical indications, or comments which give cause for concern), and on how to respond in a timely and appropriate way to such signs or to inappropriate behaviour in other members of staff or any other person working with children.

**Children who are particularly vulnerable:** We recognise that some pupils are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children. We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures, which fail to acknowledge a pupil's diverse circumstances, rather than the individual child's personality, impairment or circumstances, such as young carers or those with special educational needs or disabilities.

In some cases, possible indicators of abuse, such as a child's mood, behaviour or injury, might be assumed to relate to the child's impairment or disability rather than giving a cause for concern; or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it. Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse. Our staff are alert to those pupils with longer-term medical conditions who are young carers or have special educational needs or disabilities. Particular vigilance will be exercised in respect of pupils who are the subjects of Child Protection Plans and any incidents or concerns involving these pupils will be reported immediately to the allocated Social Worker (and confirmed in writing). If a pupil discloses that he/she has witnessed domestic violence or it is suspected that he/she may be living in a household which is affected by family violence, this will be referred to the DSL as a safeguarding issue. This will determine how and when information will be shared with parents/guardians/carers and the investigating agencies.

**Safeguarding pupils with Special Educational Needs, disabled pupils and those pupils with medical conditions:** Our staff are aware that disabled pupils experience greater risks, vulnerability and barriers to services and resources. They may have additional needs relating to physical, sensory, cognitive and/or communication impairments. Some disabled pupils may be more vulnerable to abuse because it could be assumed that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; they may have fewer outside contacts (isolation) than other pupils; receive intimate, personal care; have an impaired capacity to resist or avoid abuse; have communication difficulties; fear losing services or; be more vulnerable to child-on-child abuse (e.g. bullying, sexual assault, intimidation). Our staff are alert to the medical needs of pupils including those pupils with longer term medical conditions or disabilities and offer additional pastoral support to these pupils.

Evidence shows children with special educational needs and disabilities (SEND) are at greater risk of experiencing safeguarding concerns. The Pointer School is aware that children must be taught about safeguarding, including online safety, and recognise that a one size fits all approach may not be appropriate for all children. We understand that a more personalized or contextualised approach for SEND children might be needed. Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges, meaning that additional barriers can exist when recognising abuse and

neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

Staff need to be aware of these barriers and the specific needs of pupils with special educational needs and disabilities (SEND). Staff are able to recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online.

**Listening to the wishes of pupils and young people:** If the Pointer School believes that a child is at 'risk of harm' or 'in need', a referral to the MASH will be completed regardless of the child's or parent's wishes. We believe it is critical that our pupils have an adult who they can trust and The Pointer School ensures that there are appropriate systems so pupils know whom they can turn to and that staff will listen to them. These include: the School Council, Teachers, Youth Mental Health First Aiders, The St John's Church Reverend and helplines such as NSPCC and the Childline. The Pointer School actively encourages a sensitive and open 'listening' environment in which staff and pupils may feel free to discuss general matters relating to safeguarding and to raise specific concerns. Members of staff should use the school's whistleblowing policy if they have any concerns about the handling of safeguarding matters either in general or in specific cases, should they feel unable to raise concerns regarding child protection failures internally.

**Looked After pupils:** The Governing Body will ensure staff have the skills, knowledge and understanding necessary to keep safe pupils who are looked after (or were previously looked after) by a Local Authority, if they have such pupils on roll. This includes ensuring that there is a 'designated teacher' with appropriate training to ensure responsibility for their welfare, progress and educational achievement. The designated teacher will obtain up to date assessment information from the relevant Local Authority to ensure prompt action is taken where necessary to safeguard these children. The designated teacher will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. This includes the pupil's social worker, the most recent care plan and contact arrangements with parents, and delegated authority to carers including the pupil's legal status. In our School this person is the DSL.

**LGBT:** Children who are lesbian, gay, trans or bisexual - The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Staff will therefore endeavor to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns whenever needed.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and staff will be made aware of the range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse from the statutory guidance available.

# PUPIL MENTAL HEALTH

**Pupil Mental Health** (Please also refer to the The Pointer School Mental Health Policy): The Pointer School takes its responsibilities towards pupils that may be experiencing mental health difficulties seriously and ensure all staff are aware that 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 (KCSiE 2022). We provide support including having links with therapists, psychiatrists and the National Health Service (NHS). Our Student Well Being Committee members meet with and support pupils throughout their The Pointer School journey. Our school staff is well placed to observe pupils in their day to day and identify worrying behaviours but we understand that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Any mental health concerns, especially if it is about a child that is also a safeguarding concern, should immediately be referred to the DSL. This will then be directed to a mental health professional. We work closely with these professionals to maintain the pupils' safety within school and adhere to any advice and guidance we are given. We want to make sure our pupils are happy, healthy and thrive and understand we all need a little help from time to time with the busy and stressful lives we have today.

# USE OF TECHNOLOGY; MOBILE PHONES, CAMERAS AND ELECTRONIC DEVICES

**Mobile phones, cameras and electronic devices:** Staff should not use personal mobile telephones in the presence of pupils and must never use personal cameras for taking or storing images or recordings of pupils. Any images or recordings should only be taken, edited or stored on school computers with the express permission of the Head Teacher. Photographs or recordings should only be made where there is a legitimate school purpose. A pupils' privacy and dignity must be preserved at all times. Images or recordings should not be transmitted to third parties without permission of the Head Teacher or parents of the pupil involved. The school's Acceptable Use Policy sets out the expectations for pupils and parents on the use of mobile phones and cameras whilst at the school. Staff should not use any other electronic device capable of capturing images of pupils other than a school camera or school-issued phone. This is in line with the whole-school policy on the use of mobile phones and cameras. The LADO is to be informed if there is any contravention of the school policy regarding the use of personal mobile phones, cameras or other electronic and communication devices by adults working or volunteering at the school.

The Staff Induction Policy for EYFS reminds staff that they must not use their mobile phones in the presence of pupils and only cameras or iPads provided by the school may be used to capture images of children (for use in the learning journey and other legitimate record keeping). The LADO is to be informed if there is any contravention of the school policy regarding the use of personal mobile phones, cameras or other electronic and communication devices by adults working or volunteering at the school.

The Pointer school has in place filters and monitoring systems that do not "over block" so as not to lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding. Teachers will be vigilant in supervising pupils while using technology in the classroom.

The Pointer School is in regular contact with parents and carers. These communications are used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems our school uses to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

The Board of Governors will ensure that the school undertakes regular monitoring of IT and filtering systems in order to stay up to date with rapidly evolving technology and ensure their effectiveness. The Board of Governors will also ensure that the SLT and staff have an awareness and understanding of filtering systems in place, can manage them effectively, and know how to escalate concerns when identified. The Board of Governors will consider the age range of children at The Pointer School, the numbers on school premises and how often they access the IT system to ensure a proportionality of costs versus safeguarding risks.

# CHILDREN MISSING EDUCATION

**Children Missing Education and Missing Pupils:** Our staff will follow the School's separate procedures for dealing with pupils who go missing, particularly on repeat occasions (Please see our Missing Children Policy). All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. They should act to identify any risk of abuse and neglect, including sexual abuse or exploitation. The Pointer School will put in place appropriate safeguarding policies, procedures and responses for pupils who go missing from education, particularly on repeat occasions. Staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. It may indicate 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. More information can be found in 'Statutory guidance on pupils who run away or go missing from home or care' and KCSIE (DfE: September, 2022).

The School has an Admission Register and an Attendance Register. We will follow-up unexplained absences of any pupil with a telephone call from the school on the morning of the first day of absence and notify social services if there is an unexplained absence of more than two days of a pupil who is on the pupil safeguarding register. Wherever possible, we will hold three emergency contact details for each pupil to make contact with a responsible adult if necessary. The DSL shall also inform the applicable local authority of any pupil who has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority. Additionally, the DSL will notify the applicable local authority (within which the pupil resides) when not at The Pointer School of any pupil who is going to be deleted from the admission register where he or she:

- Has been taken out of school by his/her parents and are being educated outside the school system e.g. home education; has ceased to attend The Pointer School and no longer live within reasonable distance;
- Has been certified by a doctor as unlikely to be in a fit state of health to attend The Pointer School before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend The Pointer School after ceasing to be of compulsory school age;
- Is in custody for a period of more than four months due to a final court order and The Pointer School does not reasonably believe he/she will be returning at the end of the period or has been permanently excluded.

The applicable local authority must be notified as soon as the grounds for deletion are met, but no later than the time of deleting the pupils' name from the register. This will assist the local authority to fulfill its duty to identify pupils of compulsory school age who are missing in education and follow up with any pupil who might be in danger of not receiving an education and who might be at risk of abuse or neglect. We comply with the directives received from the local authority and the DfE with regard to reporting children who have left The Pointer School or are missing from education.

**School website safeguarding statement:** To ensure the privacy and safety of pupils where children are named, only their first names are given. By observing these points, the school ensures that visitors to the website cannot link images of pupils to full names of pupils. When choosing photographs for the website, the school is mindful of the way pupils may appear in them and will not include images that are in any way inappropriate. The Pointer School follows a policy of seeking parent, guardian or carer's permission before using images which show pupils on the website or in the local press. The list showing pupils who are barred from appearing in the press or on the website is kept in the School Office and is available whenever photographers are present. No private information about pupils is published on the website, such as surnames or contact details.

**Pupils being withdrawn from school:** If a pupil is withdrawn from the school, all efforts will be made to identify the school to which the pupil is being admitted; their confidential educational and pupil protection records will be sent separately. If the parent/guardian/carer fails to provide information regarding the new school, an urgent referral will be made to London Royal Borough of Greenwich MASH. Educational records sent

to our school concerning a pupil who is not registered by the parent will be returned and the school advised to refer to their Local Authority Education Welfare Service. A pupils' name will only be removed from the School's Admission Register in accordance with the Child Registration Regulations. Further information is contained in our Admissions Policy.

**Notifiable Incidents:** This is an incident involving the care of a pupil that meets any of the following criteria:

- A pupil has died (including cases of suspected suicide) and abuse or neglect is known or suspected;
- A looked after pupil has died (including cases where abuse is **not** known or suspected);
- A pupil has been seriously harmed and abuse or neglect is known or suspected;
- A pupil in a regulated setting or service has died (including cases where abuse is **not** known or suspected). Any such incident should be reported to Primary Child Death Review Contact (Tri borough partnership Bexley, Greenwich and Lewisham)
  - CDOP Manager, Helen Leahy ([helen.leahey@nhs.net](mailto:helen.leahey@nhs.net)) PH: 02030492088 / 07767008899
  - CDOP Administrator, Karen Ramsay ([karen.ramsay2@nhs.net](mailto:karen.ramsay2@nhs.net)) PH: 02030493453

Ofsted and the DfE along with the [Reporting of Injuries, Diseases and Dangerous Occurrences \(RIDDOR\) in accordance with the regulations of 2013.](#)

**Intention to home educate:** Home education can 'mean some children are less visible to the services that are there to keep them safe and supported in line with their needs'. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, The Pointer School will work together with LAs and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. (KCSIE 2022)

# CONFIDENTIALITY, INFORMATION SHARING AND WHISTLEBLOWING

**Whistleblowing:** Our Whistleblowing Policy, which is on the school website, is integrated into training and codes of conduct. We make it clear both in induction and other training and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within our school and to external agencies where necessary. This is one part of the way in which we establish in our school a positive, safeguarding culture. The school also has a culture of valuing staff and of reflective practice. There are procedures for reporting and handling concerns, including poor or unsafe practice and potential failures in the safeguarding regime, provision for mediation and dispute resolution where necessary. Training and support are provided for staff including transparency and accountability in relation to how concerns are received and handled. Our school has regard to KCSIE (DfE: September, 2022) and as a result has clear processes for reporting and recording allegations. The NSPCC whistleblowing helpline is available for staff that do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 or Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**Confidentiality:** We regard all information relating to individual pupil or adult protection issues as confidential and we only pass information on to appropriate persons. Our staff know they cannot promise confidentiality and that it is likely to be in the interests of the victim to seek advice and guidance from other agencies to provide support. The school will only engage staff and agencies who are required to support the children involved and / or be involved in any investigation.

**Information sharing:** Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The Pointer School has clear powers to share, hold and use information for these purposes. (KCSIE 2022), and may share information without consent if: it has not been possible to gain consent; it cannot reasonably be expected that a practitioner gains consent; and if gaining consent would place a child at risk. The school will cooperate with Children's Services and Police to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working together to safeguard children (Amended February 2019).

# ADDITIONAL SAFEGUARDING ISSUES RELATING TO THE POINTER SCHOOL

**Use of school or college premises by external organisations:** When The Pointer School hires or rents out the facilities to organisations or individuals (eg community groups or sports associations), our Board of Governors will ensure that appropriate arrangements are in place to keep children safe.

Where these activities are under the direct supervision or management of school staff, the school's arrangements for child protection will apply.

However, where services or activities are provided by another body, the Governing Body will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place to keep children safe and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. The external organisation must agree to the inspection of these arrangements and the associated documentation when required. This applies regardless of whether the children who attend these services or activities attend the school. The Board of Governors will ensure that safeguarding requirements are included in any service level agreement (ie lease or hire agreement) as a condition of use of the premises, and that failure to comply with this would lead to termination of the agreement.